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DRAFT ENVIRONMENTAL IMPACT REPORT

1880 MISSION STREET PROJECT

San Francisco Planning Department

File No. 2000.1164E

DOCUMENTS DEPT.

Draft EIR Publication Date: June 25, 2005

JUN 27 2005

Draft EIR Public Hearing Date: July 28, 2005

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Draft EIR Public Comment Period: June 25, 2005 – August 1, 2005

Written comments should be sent to:

Paul Maltzer, Environmental Review Officer, San Francisco Planning Department
1660 Mission Street, Suite 500, San Francisco, CA 94103

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PLANNING DEPARTMENT

City and County of San Francisco • 1660 Mission Street, Suite 500 • San Francisco, California • 94103-2414

MAIN NUMBER
(415) 558-6378

DIRECTOR'S OFFICE
PHONE: 558-6411

4TH FLOOR
FAX: 558-6426

ZONING ADMINISTRATOR
PHONE: 558-6350

5TH FLOOR
FAX: 558-6409

PLANNING INFORMATION
PHONE: 558-6377

MAJOR ENVIRONMENTAL
FAX: 558-5991

COMMISSION CALENDAR
INFO: 558-6422

INTERNET WEB SITE
WWW.SFGOV.ORG/PLANNING

DATE: June 25, 2005

TO: Distribution List for the 1880 Mission Street Project

FROM: Paul Maltzer, Environmental Review Officer

SUBJECT: Request for the 1880 Mission Street Project (Case No. 2000.1164E)

This is the Draft of the Environmental Impact Report (EIR) for the 1880 Mission Street Project. A public hearing will be held on the adequacy and accuracy of this document. After the public hearing, we will prepare and publish a document titled "Summary of Comments and Responses" that will contain a summary of all relevant comments on this Draft EIR and our responses to those comments. It may also specify changes to this Draft EIR. Those who testify at the hearing on the Draft EIR will automatically receive a copy of the Comments and Responses document, along with notice of the date reserved for certification; others may receive such copies and notice on request or by visiting our office. This Draft EIR together with the Summary of Comments and Responses document will be considered by the City Planning Commission in an advertised public meeting(s) and certified as a Final EIR if deemed adequate.

After certification, we will modify the Draft EIR as specified by the Comments and Responses document and print both documents in a single publication called the Final EIR. The Final EIR will add no new information to the combination of the two documents except to reproduce the certification resolution. It will simply provide the information in one, rather than two, documents. Therefore, if you receive a copy of the Comments and Responses document in addition to this copy of the Draft EIR, you will technically have a copy of the Final EIR.

We are aware that many people who receive the Draft EIR and Summary of Comments and Responses have no interest in receiving virtually the same information after the EIR has been certified. To avoid expending money and paper needlessly, we would like to send copies of the Final EIR to private individuals only if they request them. If you would like a copy of the Final EIR, therefore, please fill out and mail the postcard provided inside the back cover to the San Francisco Planning Department within two weeks after certification of the EIR. Any private party not requesting a Final EIR by that time will not be mailed a copy. Public agencies on the distribution list will automatically receive a copy of the Final EIR.

Thank you for your interest in this project.

1880 Mission Street Project

Draft Environmental Impact Report

June 25, 2005

TABLE OF CONTENTS

	<u>Page</u>
I. SUMMARY	1
A. Project Description.....	1
B. Environmental Setting and Impacts.....	1
C. Mitigation Measures and Improvement Measures	4
D. Alternatives.....	14
E. Unresolved Issues and Areas of Controversy.....	15
II. PROJECT DESCRIPTION	16
A. Project Objectives	16
B. Project Location	17
C. Project Characteristics	19
D. Project Schedule, Cost, and Approvals	21
III. ENVIRONMENTAL SETTING AND IMPACTS	24
A. Architectural Resources	24
B. Growth Inducement	40
IV. MITIGATION MEASURES AND IMPROVEMENT MEASURES	41
A. Mitigation Measures	41
B. Improvement Measures	49
V. SIGNIFICANT ENVIRONMENTAL EFFECTS THAT CANNOT BE AVOIDED IF THE PROPOSED PROJECT IS IMPLEMENTED	51
VI. ALTERNATIVES TO THE PROPOSED PROJECT	52
A. Alternative A: No Project.....	52
B. Alternative B: Adaptive Reuse/Preservation of Existing Building.....	53
VII. DRAFT EIR DISTRIBUTION LIST	60
VIII. REPORT PREPARERS AND PERSONS CONSULTED.....	72

Appendix

A. Initial Study

List of Figures

1.	Project Location	18
2.	Ground Floor Plan	20
3.	15th Street and Mission Street Elevations	22
4.	Interior Lot Line and Julian Street Elevations	23
5.	Existing Mission Street and 15th Street Elevations	26
6.	Existing North Elevation and West Elevation near Julian Street	27
7.	1906 Advertisement for “The New Home of The Louis Roesch Co.”	28
8.	Adaptive Reuse/Preservation	55

I. SUMMARY

A. PROJECT DESCRIPTION (p. 16)

The proposed project would be the development of a mixed-use residential and commercial development within the block bounded by Mission, Julian, 14th, and 15th Streets in San Francisco's Mission District. The proposed development is a seven-story-plus-basement building containing 194 dwelling units, including 39 affordable units and 8,536 square feet of retail space. The proposed project would demolish two existing buildings: the 1886 Mission Street building, built in 1906 as the Louis Roesch Company printing plant, and a 1951 addition to the west.

B. ENVIRONMENTAL SETTING AND IMPACTS (p. 24)

On the basis of an Initial Study published on April 23, 2005, the San Francisco Planning Department determined that an Environmental Impact Report (EIR) was required. The Initial Study determined that the following effects of the project would either be insignificant or would be reduced to a less-than-significant level by mitigation measures included as a part of the project and thus required no further analysis: compatibility with existing zoning and plans; land use; visual quality; population; transportation; noise; air quality, shadow, wind, utilities/public services, biology, geology/topography, water, energy/natural resources; hazards; and archeological resources. Therefore, the EIR does not discuss these issues. The Initial Study found the potential for significant environmental effects in the area of historic architectural resources, specifically the environmental effects associated with the proposed demolition of the Louis Roesch Company building located at 1886 Mission Street.

ARCHITECTURAL RESOURCES (p. 24)

Two buildings currently occupy the project site: the 1886 Mission Street building, built in 1906 as the Louis Roesch Company printing plant, and a 1951 addition to the west. Construction of the Louis Roesch Company building began shortly after the earthquake and fire that devastated much of San Francisco. The building was designed in by Emil A. Hermann, an architect who practiced in San Francisco from 1892 to 1917. The existing structure was built to contain multiple uses that resulted in a hybrid mixed-use building

composed of two distinct plan elements. The portion of the building that fronts along Mission Street, the east façade, is built of a simplified variation on the standard wood-frame construction. The exterior walls are wood-framed with no exterior sheathing and are covered with stamped sheet tin. Above this portion of the building is a flat roof that is concealed by a parapet composed of curved and stepped elements. The Mission Street façade features articulated end bays at the parapet and top floor. Both the parapet and the upper story are covered with pressed tin sheets, approximately two feet high by six feet wide, that are intended to simulate brick masonry. The lower portion of the structure contains the building entrance, centered on the east façade, flanked by three former retail spaces with mezzanines on each side of the entrance. The portion of the building that fronts along 15th Street, the south façade, is roughly symmetrical and features articulated end bays. The lower level of this façade is faced with pressed tin in a pattern that resembles large masonry blocks. The building's upper level consists of paired sets of one-over-one double-hung windows with aluminum sash. The upper portion of the north façade is covered with the stamped tin, while the balance of this façade, as with west façade, is covered in corrugated sheet metal.

The Roesch Building is within the survey boundaries of the Inner Mission North (IMN) Cultural Resources Survey Area prepared by the San Francisco Planning Department. Conducted in October 2002 through September 2003, the IMN survey inventoried and evaluated 420 properties in the Inner Mission neighborhood to determine their eligibility for listing on the National Register of Historic Places. Of the two existing structures on the project site, the Roesch Building and the 1951 addition to the west, the Roesch Building was assigned a California Historical Resource Code 3CS, indicating that, based upon "the building's architecture and building construction technology," it appears to be eligible for individual listing on the National Register under Criterion C, Design/Construction. The Planning Department's determination of eligibility is based on the building's architecture employing what is judged to be an unusual construction type for San Francisco, specifically its use of embossed metal sheeting as siding material. The study also determined that the Roesch Building is one of three Mission Revival commercial buildings in the IMN survey area.

A review of the information regarding the Roesch Building and a study of the property was conducted by McGrew / Architecture of San Francisco. The McGrew study argues that the

use of metal sheeting was not an aesthetic decision, as stated on the IMN survey documentation, but rather an economic decision to use the least expensive materials possible. Sheet tin, the report states, was, in most cases, the equivalent of today's asbestos siding. The report further argues that the Roesch Building lacks the fundamental elements of the Mission Revival style, including stucco walls and clay tile roofing, and that the two buildings within the IMN survey area that the Planning Department groups with the Roesch Building do not bear a factual resemblance to the Mission Revival style. The McGrew report also finds that building is deteriorated, particularly regarding the elements that arguably lend it historic character. The McGrew report concludes that the Roesch Building cannot be considered National Register eligible, because to be eligible under Criterion C, the property must embody the *distinctive characteristics of a type, period, or method of construction; represent the work of a master; or posses high artistic values*. The McGrew report concludes that based on its assessment, the proper designation for the building is a 6Z. A 6Z means that the property is "ineligible for National Register, California Register or Local designation through survey evaluation."

Architectural historian Michael Corbett conducted a study of the Roesch Building and found the property to be significant for its construction and use of materials; its architect, Emil A. Hermann; and its association with several themes and events important to the history of San Francisco, including the period that followed the earthquake and fire of 1906, the printing industry, organized labor, fraternal and benevolent organizations, and the city's German community.

In terms of design and construction, Corbett identifies the Roesch Building as a "distinctive example of a typical form of construction," which, like many buildings constructed since the Gold Rush, employed timber construction and sheet metal cladding for protection against fire. What was unusual about the Roesch Building, Corbett argues, was the use of pressed metal on the street façades, rather than less expensive corrugated metal. The materials in the building's construction are unique in that they are not typically associated with industrial design; they were used for predominantly for residential work. Corbett states that the use of pressed metal represents an attempt to create an appearance that was more compatible with the surrounding mixed neighborhood of homes and businesses. Corbett finds the building's mixture of office,

commercial, industrial, and communal uses to be highly unusual for its location in a predominately residential area.

The San Francisco Planning Department has concluded that the Roesch Building is eligible for listing on the National Register of Historic Places under Criterion C, due to the building's architecture and building construction technology, which represent the distinctive characteristics of a type, period, or method of construction. The Planning Commission held a hearing on February 17, 2005 to review the LPAB determination to uphold the Planning Department conclusion of 3CS. After taking testimony and reviewing the Planning Department and McGrew reports, the Commission voted 5-2 to redesignate the building as 6L, which means "ineligible for local listing or designation through local government review process; may warrant special consideration in local planning." Although there is disagreement among the sources, this EIR considers the Roesch Building a significant historical resource as defined by CEQA.

Therefore, the demolition of the Roesch Building would be "deemed significant" per CEQA Section 21084.1. Demolition of the Roesch Building would be a significant adverse effect of the proposed project on historical architectural resources.

C. MITIGATION MEASURES AND IMPROVEMENT MEASURES (p. 41)

Mitigation measures identified in this EIR or in the Initial Study to mitigate significant environmental effects are listed below. Mitigation measures would reduce but not eliminate significant architectural resources effects.

ARCHITECTURAL RESOURCES

1. Prior to any physical removal of buildings or site features, the project sponsor would prepare, or cause to be prepared, documentation of the Roesch Building. Such documentation would include the precise recording of the structure through measurements, drawings, and photographs and would meet the Historic American Buildings Survey (HABS) recordation standards. The HABS documentation would include the following:
 - A HABS outline report would be prepared and would include descriptive and historical information about the building and its architect. Information from the previous reports prepared for the Roesch Building, including the Primary

Record and the Building, Structure, and Object Record prepared by the San Francisco Planning Department for the IMN Cultural Resources Survey Area and McGrew / Architecture, *Analysis of Historic Resource Potential: Roesch Building, 1886-98 Mission Street, San Francisco, California 94103, September 1, 2004* would be used to fulfill some of the requirements for descriptive and historical information.

- Photographic documentation of the exterior of the Roesch Building and its neighborhood setting would be prepared.
 - Photographic documentation of selected interiors, including a portion of the printing plant would be prepared. The selected portion would be appropriately described in the outline report and keyed to the photographs.
 - All photographic documentation would follow the HABS Photographic Standards for detail and quality, use of large format photographs and negatives, archival processing, labeling, and sacrificial test prints. Two sets of archival prints and one set of archival negatives would be prepared.
 - Existing architect's drawings of the Roesch Building would be included in the HABS documentation. Reference would be made in the documentation report to the repository where the drawings are housed.
2. The documentation of the Roesch Building would be submitted to the following repositories:
- Documentation report, one set of photographs and negatives, and a copy of the original drawings (identified in the Appendix II of *Draft Historic Significance Evaluation of the Roesch Building* as "Original Drawings for the Roesch Building by Emil A. Hermann") would be submitted to the History Room of the San Francisco Public Library.
 - Documentation report would be submitted to the Northwest Information Center of the California Historical Resources Information Resource System.
 - Documentation report, one set of photographs, and original drawings would be submitted to the Environmental Design Archives, in the College of Environmental Design, University of California, Berkeley. The original drawings are identified in the Appendix II of *Draft Historic Significance Evaluation of the Roesch Building* as "Original Drawings for the Roesch Building by Emil A. Hermann."
 - The documentation report and xerographic copies of the photographs would be submitted to the San Francisco Planning Department for review prior to issuance of any permit that may be required by the City and County of San Francisco for demolition of the Roesch Building.
 - The documentation report and xerographic copies of the photographs would be submitted to the San Francisco Landmarks Preservation Advisory Board.

3. The project sponsor would provide a publicly accessible interpretive display area on the project site to include interpretive materials, such as photographs, oral histories, architectural drawings and site plans, and written histories documenting the lives of, and events associated with, past occupants of the Roesch Building. The interpretive display would be submitted to the San Francisco Landmarks Preservation Advisory Board (LPAB) for review and approval prior to issuance of a final certificate of occupancy for the project. Copies of all interpretive materials shall also be donated to the History Room of the San Francisco Public Library. The LPAB may appoint a liaison to work with the project sponsor in directing the research on the interpretive materials.

AIR QUALITY

4. The project sponsor shall require the contractor(s) to spray the site with water during demolition, excavation, and construction activities; spray unpaved construction areas with water at least twice per day; cover stockpiles of soil, sand, and other material; cover trucks hauling debris, soils, sand or other such material; and sweep surrounding streets during demolition, excavation, and construction at least once per day to reduce particulate emissions.

Ordinance 175-91, passed by the Board of Supervisors on May 6, 1991, requires that non-potable water be used for dust control activities. Therefore, the project sponsor shall require the contractor(s) to obtain reclaimed water from the Clean Water Program for this purpose. The project sponsor shall require the project contractor(s) to maintain and operate construction equipment so as to minimize exhaust emissions of particulates and other pollutants, by such means as a prohibition on idling motors when equipment is not in use or when trucks are waiting in queues, and to implement specific maintenance programs to reduce emissions for equipment that would be in frequent use for much of the construction period.

HAZARDS

5. Contaminated Soil and Underground Storage Tank Removal

- a: Determination of Presence of Lead-Contaminated Soil

Prior to approval of a building permit for the project, the project sponsor shall hire a consultant to collect soil samples (borings) from areas on the site in which soil would be disturbed and test the soil samples for total lead. The consultant shall analyze the soil borings as discrete, not composite, samples.

The consultant shall prepare a report on the soil testing for lead that includes the results of the soil testing and a map that shows the locations of stockpiled soils from which the consultant collected the soil samples.

The project sponsor shall submit the report on the soil testing for lead and a fee of \$425 in the form of a check payable to the San Francisco Department of Public Health (SFDPH), to the Hazardous Waste Program, Department of

Public Health, 101 Grove Street, Room 214, San Francisco, California 94102. The fee of \$425 shall cover five hours of soil testing report review and administrative handling. If additional review is necessary, DPH shall bill the project sponsor for each additional hour of review over the first five hours, at a rate of \$85 per hour. These fees shall be charged pursuant to Section 31.47(c) of the San Francisco Administrative Code. DPH shall review the soil testing report to determine to whether soils on the project site are contaminated with lead at or above potentially hazardous levels.

If DPH determines that the soils on the project site are not contaminated with lead at or above a potentially hazardous level (i.e., below 50 ppm total lead), no further mitigation measures with regard to lead-contaminated soils on the site would be necessary.

The project sponsor shall implement one of several options for closure of the underground storage tanks. These include in-place closure as well as excavation and removal of the tanks. Under either closure method, DPH would require further characterization of the soil. Remedial actions associated with the underground tanks at the project site, if required by DPH, shall be performed concurrently or shortly following site demolition.

b: Preparation of Site Mitigation Plan

If based on the results of the soil tests conducted, DPH determines that the soils on the project site are contaminated with lead at or above potentially hazardous levels, the DPH shall determine if preparation of a Site Mitigation Plan (SMP) is warranted. If such a plan is requested by the DPH, the SMP shall include a discussion of the level of lead contamination of soils on the project site and mitigation measures for managing contaminated soils on the site, including, but not limited to: 1) the alternatives for managing contaminated soils on the site (e.g., encapsulation, partial or complete removal, treatment, recycling for reuse, or a combination); 2) the preferred alternative for managing contaminated soils on the site and a brief justification; and 3) the specific practices to be used to handle, haul, and dispose of contaminated soils on the site. The SMP shall be submitted to the DPH for review and approval. A copy of the SMP shall be submitted to the Planning Department to become part of the case file.

c: Handling, Hauling, and Disposal of Lead-Contaminated Soils

i. Specific Work Practices: If based on the results of the soil tests conducted, DPH determines that the soils on the project site are contaminated with lead at or above potentially hazardous levels, the construction contractor shall be alert for the presence of such soils during excavation and other construction activities on the site (detected through soil odor, color, and texture and results of on-site soil testing), and shall be prepared to handle, profile (i.e., characterize), and dispose

of such soils appropriately (i.e., as dictated by local, state, and federal regulations, including OSHA lead-safe work practices) when such soils are encountered on the site.

- ii. **Dust Duppression:** Soils exposed during excavation for site preparation and project construction activities shall be kept moist throughout the time they are exposed, both during and after work hours.
- iii. **Surface Water Runoff Control:** Where soils are stockpiled, visqueen shall be used to create an impermeable liner, both beneath and on top of the soils, with a berm to contain any potential surface water runoff from the soil stockpiles during inclement weather.
- iv. **Soils Replacement:** If necessary, clean fill or other suitable material(s) shall be used to bring portions of the project site, where lead-contaminated soils have been excavated and removed, up to construction grade.
- v. **Hauling and Disposal:** Contaminated soils shall be hauled off the project site by waste hauling trucks appropriately certified with the State of California and adequately covered to prevent dispersion of the soils during transit, and shall be disposed of at a permitted hazardous waste disposal facility registered with the State of California.

d: **Preparation of Closure/Certification Report**

After excavation and foundation construction activities are completed, the project sponsor shall prepare and submit a closure/certification report to DPH for review and approval. The closure/certification report shall include the mitigation measures in the SMP for handling and removing lead-contaminated soils from the project site, whether the construction contractor modified any of these mitigation measures, and how and why the construction contractor modified those mitigation measures.

ARCHAEOLOGICAL RESOURCES

6. Based on a reasonable presumption that archeological resources may be present within the project site, the following measures shall be undertaken to avoid any potentially significant adverse effect from the proposed project on buried or submerged historical resources. The project sponsor shall retain the services of a qualified archeological consultant having expertise in California prehistoric and urban historical archeology. The archeological consultant shall undertake an archeological testing program as specified herein. In addition, the consultant shall be available to conduct an archeological monitoring and/or data recovery program if required pursuant to this measure. The archeological consultant's work shall be conducted in accordance with this measure at the direction of the Environmental Review Officer (ERO). All plans and reports prepared by the consultant as specified herein shall be submitted first and

directly to the ERO for review and comment, and shall be considered draft reports subject to revision until final approval by the ERO. Archeological monitoring and/or data recovery programs required by this measure could suspend construction of the project for up to a maximum of four weeks. At the direction of the ERO, the suspension of construction can be extended beyond four weeks only if such a suspension is the only feasible means to reduce to a less than significant level potential effects on a significant archeological resource as defined in CEQA Guidelines Sect. 15064.5 (a) (c).

Archeological Testing Program. The archeological consultant shall prepare and submit to the ERO for review and approval an archeological testing plan (ATP). The archeological testing program shall be conducted in accordance with the approved ATP. The ATP shall identify the property types of the expected archeological resource(s) that potentially could be adversely affected by the proposed project, the testing method to be used, and the locations recommended for testing. The purpose of the archeological testing program will be to determine to the extent possible the presence or absence of archeological resources and to identify and to evaluate whether any archeological resource encountered on the site constitutes an historical resource under CEQA.

At the completion of the archeological testing program, the archeological consultant shall submit a written report of the findings to the ERO. If based on the archeological testing program the archeological consultant finds that significant archeological resources may be present, the ERO in consultation with the archeological consultant shall determine if additional measures are warranted. Additional measures that may be undertaken include additional archeological testing, archeological monitoring, and/or an archeological data recovery program. If the ERO determines that a significant archeological resource is present and that the resource could be adversely affected by the proposed project, at the discretion of the project sponsor either:

- a. The proposed project shall be re-designed so as to avoid any adverse effect on the significant archeological resource; or
- b. A data recovery program shall be implemented, unless the ERO determines that the archeological resource is of greater interpretive than research significance and that interpretive use of the resource is feasible.

Archeological Monitoring Program. If the ERO in consultation with the archeological consultant determines that an archeological monitoring program shall be implemented the archeological monitoring program shall minimally include the following provisions:

- The archeological consultant, project sponsor, and ERO shall meet and consult on the scope of the AMP reasonably prior to any project-related soils disturbing activities commencing. The ERO in consultation with the archeological consultant shall determine what project activities shall be archeologically monitored. In most cases, any soils-disturbing activities, such as demolition, foundation removal, excavation, grading, utilities installation, foundation work,

driving of piles (foundation, shoring, etc.), site remediation, etc., shall require archeological monitoring because of the risk these activities pose to potential archaeological resources and to their depositional context;

- The archeological consultant shall advise all project contractors to be on the alert for evidence of the presence of the expected resource(s), of how to identify the evidence of the expected resource(s), and of the appropriate protocol in the event of apparent discovery of an archeological resource;
- The archeological monitor(s) shall be present on the project site according to a schedule agreed upon by the archeological consultant and the ERO until the ERO has, in consultation with project archeological consultant, determined that project construction activities could have no effects on significant archeological deposits;
- The archeological monitor shall record and be authorized to collect soil samples and artifactual/ecofactual material as warranted for analysis;
- If an intact archeological deposit is encountered, all soils-disturbing activities in the vicinity of the deposit shall cease. The archeological monitor shall be empowered to temporarily redirect demolition/excavation/pile driving/construction activities and equipment until the deposit is evaluated. If in the case of pile driving activity (foundation, shoring, etc.), the archeological monitor has cause to believe that the pile driving activity may affect an archeological resource, the pile driving activity shall be terminated until an appropriate evaluation of the resource has been made in consultation with the ERO. The archeological consultant shall immediately notify the ERO of the encountered archeological deposit. The archeological consultant shall make a reasonable effort to assess the identity, integrity, and significance of the encountered archeological deposit, and present the findings of this assessment to the ERO.

Whether or not significant archeological resources are encountered, the archeological consultant shall submit a written report of the findings of the monitoring program to the ERO.

Archeological Data Recovery Program. The archeological data recovery program shall be conducted in accord with an archeological data recovery plan (ADRP). The archeological consultant, project sponsor, and ERO shall meet and consult on the scope of the ADRP prior to preparation of a draft ADRP. The archeological consultant shall submit a draft ADRP to the ERO. The ADRP shall identify how the proposed data recovery program will preserve the significant information the archeological resource is expected to contain. That is, the ADRP will identify what scientific/historical research questions are applicable to the expected resource, what data classes the resource is expected to possess, and how the expected data classes would address the applicable research questions. Data recovery, in general, should be limited to the portions of the historical property that could be adversely affected by the proposed project.

Destructive data recovery methods shall not be applied to portions of the archeological resources if nondestructive methods are practical.

The scope of the ADRP shall include the following elements:

- **Historical Context.** Historical background of project site and of historical themes related to history of site by which to predict and evaluate historical significance of expected archeological resources.
- **Research Themes and Questions.** Significant historical/scientific research issues and specific questions to which data from the expected archeological resources would provide a consequential contribution.
- **Field Methods and Procedures.** Descriptions of proposed field strategies, procedures, and operations.
- **Cataloguing and Laboratory Analysis.** Description of selected cataloguing system and artifact analysis procedures.
- **Discard and Deaccession Policy.** Description of and rationale for field and post-field discard and deaccession policies.
- **Interpretive Program.** Consideration of an on-site/off-site public interpretive program during the course of the archeological data recovery program.
- **Security Measures.** Recommended security measures to protect the archeological resource from vandalism, looting, and non-intentionally damaging activities.
- **Final Report.** Description of proposed report format and distribution of results.
- **Curation.** Description of the procedures and recommendations for the curation of any recovered data having potential research value, identification of appropriate curation facilities, and a summary of the accession policies of the curation facilities.

Human Remains and Associated or Unassociated Funerary Objects. The treatment of human remains and of associated or unassociated funerary objects discovered during any soils disturbing activity shall comply with applicable State and Federal laws. This shall include immediate notification of the Coroner of the City and County of San Francisco and in the event of the Coroner's determination that the human remains are Native American remains, notification of the California State Native American Heritage Commission (NAHC) who shall appoint a Most Likely Descendant (MLD) (Pub. Res. Code Sec. 5097.98). The archeological consultant, project sponsor, and MLD shall make all reasonable efforts to develop an agreement for the treatment of, with appropriate dignity, human remains and associated or unassociated funerary objects (CEQA Guidelines. Sec. 15064.5(d)). The agreement should take into consideration the appropriate excavation, removal, recordation, analysis, custodianship, curation, and final disposition of the human remains and associated or unassociated funerary objects.

Final Archeological Resources Report. The archeological consultant shall submit a Draft Final Archeological Resources Report (FARR) to the ERO that evaluates the historical significance of any discovered archeological resource and describes the archeological and historical research methods employed in the archeological testing/monitoring/data recovery program(s) undertaken. Information that may put at risk any archeological resource shall be provided in a separate removable insert within the final report.

Once approved by the ERO, copies of the FARR shall be distributed as follows: California Archaeological Site Survey Northwest Information Center (NWIC) shall receive one (1) copy and the ERO shall receive a copy of the transmittal of the FARR to the NWIC. The Major Environmental Analysis division of the Planning Department shall receive three copies of the FARR along with copies of any formal site recordation forms (CA DPR 523 series) and/or documentation for nomination to the National Register of Historic Places/California Register of Historical Resources. In instances of high public interest in or the high interpretive value of the resource, the ERO may require a different final report content, format, and distribution than that presented above.

IMPROVEMENT MEASURES

Improvement Measures identified in this EIR or in the Initial Study to reduce effects of the project that are identified in the environmental analysis as being less-than-significant impacts are listed below.

Transportation Improvement Measures

Improvement Measure 1

During the construction period, the project sponsor would cause to limit construction truck movement to the hours between 9:00 a.m. and 3:30 p.m., or other hours if approved by the DPT, and to prohibit staging or unloading of equipment and materials during the periods of 7:00 a.m. to 9:00 a.m. and 3:30 p.m. to 6:00 p.m., to minimize peak-period traffic conflicts and to accommodate queuing of Muni buses during the peak hours of service. The project sponsor and construction contractor would meet with the Traffic Engineering Division of DPT, the Fire Department, Muni, and the Planning Department to determine feasible traffic management and mitigation measures to reduce traffic congestion during construction of this project and other nearby projects. To minimize cumulative traffic impacts due to lane closures during construction, the project sponsor would coordinate with construction contractors for any concurrent nearby projects that are planned for construction of which later become known.

Improvement Measure 2

The project sponsor would, in cooperation with Muni, install eyebolts or make provision for the direct attachment of eyebolts for Muni trolley wires on the project building whenever necessary, or agree to waive all rights to refuse the attachment of eye bolts to the project building if such attachment is done at the City's expense.

The following are improvement measures that have not been agreed to by the project sponsor but are recommended by the Planning Department.

Improvement Measure 3

If the project parking garage were to provide parking for the general public, the project sponsor shall provide an electronic "Full" sign that is clearly visible from the street outside the parking garage entrance to ensure that on-street vehicle queuing would be minimized.

Improvement Measure 4

The project would not have a considerable contribution to the significant cumulative PM peak-hour traffic impact at the intersections of 15th/Valencia Streets and 14th/Valencia Street. However, the following measures are recommended to address those cumulative effects:

The San Francisco Department of Parking and Traffic (DPT) could, if deemed appropriate at a future time, establish a separate right-turn lane on the southbound Valencia Street approach to 15th Street. The intersection level of service under cumulative (2015) conditions would improve to LOS B if this measure were implemented. This measure would require removal of on-street parking spaces on the west side of Valencia Street, and configuration of pavement markings and signs to channelize autos into the right-turn lane without substantially impeding access to the Class II bicycle lane. This measure is not required to mitigate a project impact, but rather is a measure that could be implemented by DPT to reduce impacts caused by estimated cumulative growth in traffic, to which the project would contribute.

DPT could, if deemed appropriate at a future time, modify the traffic signal phasing and timing at the 14th/Valencia Streets intersection during the PM peak period, specifically by providing a phase for southbound through and left-turn traffic only, in advance of the current phase for north-south traffic on signal phases of Valencia Street. The change in signal phasing and timing would improve the PM peak-hour traffic level of service to an acceptable (LOS D). This measure is not required to mitigate a project impact, but rather is a measure that could be implemented by DPT to reduce impacts caused by estimated cumulative growth in traffic, to which the project would contribute.

D. ALTERNATIVES

In compliance with CEQA requirements, this EIR analyzes a reasonable range of project alternatives that would reduce or eliminate significant impacts of the project. These alternatives include a No Project Alternative and an Adaptive Reuse/Preservation Alternative.

ALTERNATIVE A: NO PROJECT

The No Project Alternative would entail no change to the site. The proposed project would not be implemented. The two existing buildings on the proposed project would not be demolished, and none of the existing architectural features would be altered. None of the impacts associated with the proposed project would occur. The environmental characteristics of this alternative are described in the environmental setting section of Chapter III of this EIR and the Initial Study (see Appendix A).

ALTERNATIVE B: ADAPTIVE REUSE/PRESERVATION OF EXISTING BUILDING

This alternative would preserve key architectural features on the exterior of the building, while substantially upgrading the interiors to conform with current seismic, life safety, and other building code requirements for residential use. The sheet-metal siding, with no sheathing, would not be preserved, but would be replaced with material that would match the visual qualities of the original. Changes to the Mission Street façade would restore doors and windows to their original character.

This alternative would construct approximately 20 studio and one-bedroom units in the existing Roesch Building. Windows would be cut into the existing building walls to serve the new dwelling units. Approximately 9,000 square feet of retail and approximately 1,000 square feet of community space would be located at the portion of the building that fronts on Mission Street and 15th Streets. Approximately 80 studio and one-bedroom units would be constructed in two new buildings that would be about five and six stories high and located around the Roesch Building. The new buildings would be separated by a 20-foot-wide courtyard. Underground parking of up to 90 cars (60 standard and 30 tandem) would be located in a one-story garage under the new buildings. This alternative would provide a total of 100 dwelling units, compared to 194 units with the proposed project; the alternative would provide

90 parking spaces compared to about 180 individual spaces with the proposed project. The City and County of San Francisco has been qualified as a Certified Local Government, which applies and implements the *Secretary of the Interior's Standards for the Treatment of Historic Properties and Guidelines for Preserving, Rehabilitating, Restoring, and Restructuring Historic Buildings* (the *Standards*). The San Francisco Landmarks Preservation Advisory Board has adopted the *Secretary's Standards* for the Board's consideration of applications to alter historic resources. Alternative B would retain the defining exterior characteristics of the Roesch Building, and would be considered generally consistent with the *Standards*. This alternative would avoid the proposed project's potentially significant impact to historic resources associated with demolition of the Roesch Building.

E. UNRESOLVED ISSUES AND AREAS OF CONTROVERSY

The principal area of controversy associated with the proposed project is the potential impact of demolition of the Roesch Building. For purposes of CEQA, the Roesch Building is treated in this EIR as an historical resource, and its demolition would be a significant adverse effect.

The design of the proposed project is not final, and the EIR analysis of potential impacts associated with the proposed project is based on schematic or preliminary design information that could be refined and/or modified during the project review and approval process. Design modifications are not expected to alter the analysis and conclusions of this EIR; however, any proposed changes will be evaluated by Planning Department staff to determine if new significant impacts would result.

II. PROJECT DESCRIPTION

ARMAX International, Inc., the project sponsor, proposes to develop a mixed-use residential and commercial development within the block bounded by Mission, Julian, 14th, and 15th Streets in San Francisco's Mission District. The proposed development would be a seven-story-plus-basement building containing 194 dwelling units, including 39 affordable units, 8,536 gross square feet (gsf) of retail space, and 181 parking spaces. The proposed project would demolish two existing buildings: the 1886 Mission Street building, built in 1906 as the Louis Roesch Company printing plant, as well as a 1951 addition to the west.

A. PROJECT OBJECTIVES

The project sponsor has identified the following project objectives:

- Provide much needed market-rate housing, including family-sized units, as well as a 20 percent affordable housing component.
- In response to a chronic need for housing of varying sizes at locations that are well served by local and regional transit, the project would deliver 194 units, including 39 affordable units, of transit-based housing.
- Provide public- and community-serving amenities.

The project would also include public- and/or community-serving amenities, such as retail space that will accommodate smaller, neighborhood-serving retail services that will be a local as opposed to a regional destination. The project also features accessible open space on both the ground and podium levels and a community room and fitness center designed to serve the needs of the residents and, as appropriate, the public.

- Memorialize the contributions of the printing industry and its workers to San Francisco cultural and economic history.

The project would include a large museum quality exhibit window on Mission Street depicting the history of the Louis Roesch Company, the printing company that has occupied the building since its construction. The project will also include a permanent exhibit explaining the history of the printing industry in San Francisco in the residential lobby of the building. To highlight the use of pressed metal cladding on the building, which is one of the major contributors to the building's historic character, the project will use salvaged cladding in its public exhibits.

- Use contemporary Mexican architecture to reflect the modern cultural history of the neighborhood.

The architectural style of the building will be Contemporary Mexican, combining stylistic qualities found in the best of modern Latino urban architecture. This translates into strong geometric elements combined with traditional, colorful materials and decorative treatments.

- Minimize the massing of the building with various architectural features.

Because of the prominent location of this building at the end of the Mission Street corridor, the scale of the building has been broken up with bay windows, balconies, cornices and other projections.

- Contribute to the revitalization of the Mission Street corridor from the freeway to 16th Street.

By introducing a substantial amount of new housing and ground-floor retail to this area, the overall project would generate both daytime and nighttime activity and would serve as a significant catalyst to economic revitalization to this portion of Mission Street.

B. PROJECT LOCATION

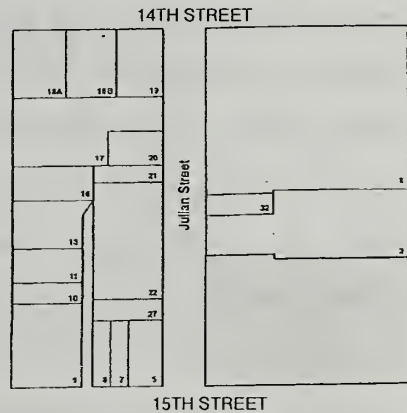
The project site is at 1880-1886 Mission Street, on Assessor's Block 3547, on Lots 2A, 3, 4, and 29, and is approximately 51,888 square feet (sf) in size. The project site is bordered by Mission Street to the east, 15th Street to the south and Julian Street to the west (see Figure 1). The project site is located in a Heavy Commercial (C-M) zoning district, within a 65-B/50-X Height and Bulk district, as well as the Mission District Interim Controls district. The project site includes two buildings: the 1886 Mission Street building, built in 1906 as the Louis Roesch Company printing plant, as well as a 1951 addition to the west. The project site also includes a parking lot on the north side of the site.

Existing development in the project vicinity is primarily devoted to commercial and residential uses, with some medium-sized office buildings located two to three blocks away to the north of the Central Freeway. In the immediate site vicinity are neighborhood commercial/retail uses, light-industrial uses, community service uses, and multi-family residential buildings.

Along Mission Street, the project block includes a community service building and the currently vacant State Armory and Arsenal Building. The building across Mission Street to



- Legend**
- 3547 BLOCK NUMBER
 - 2A,3,4, and 29 LOT NUMBERS
 - PROJECT LOCATION



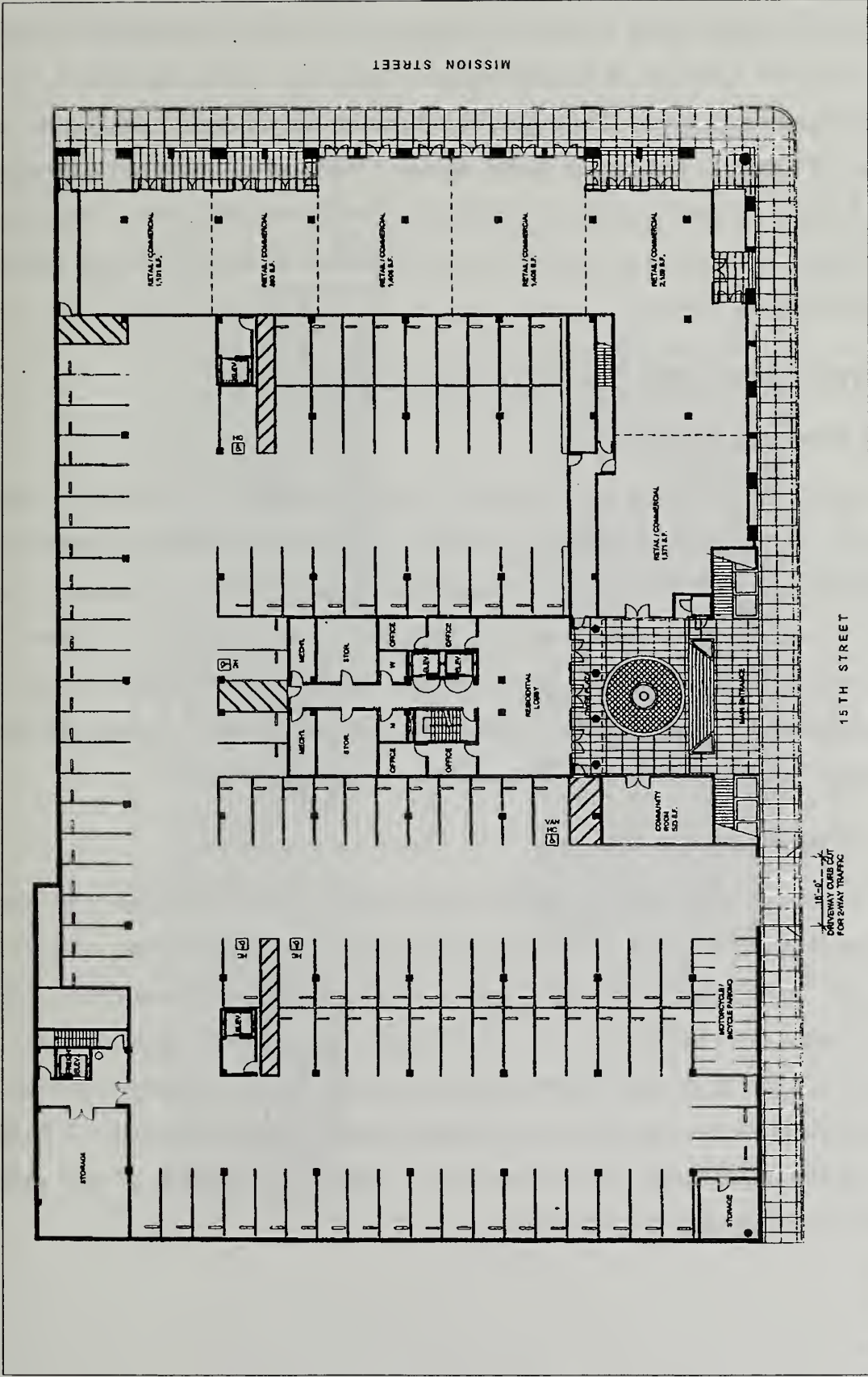
1880 MISSION STREET
 FIGURE 1: PROJECT LOCATION

the east is a three-story commercial building. Immediately across 15th Street to the south is a two-story automotive repair building and three-story residential buildings. The large blocks are bisected by narrow streets lined primarily with two- to four-story multi-family dwellings and commercial uses. Two- to four-story residences, many with ground floor retail, also line much of the major thoroughfares of Mission and Valencia Streets. Vincentian Villa, an elderly residential facility, is across Mission Street and north of the project site. Valencia Gardens, a former public housing site, is one block to the west and is under construction as a HOPE VI affordable residential and commercial development, with 290 units. Small parking lots for private parking and used/new car sales are also a common use.

Julian Street between 14th and 15th Streets is commercial in character, with two- to three-story buildings, a parking lot, and a residential building on the northwest corner of Julian and 14th Street. Julian Street between 15th and 16th Streets is predominately low-density residential in character mid-block with a large church building and a bank on either end of the western side of the street as anchors. Across Julian Street from the project site is the Native American Friendship House, a residential drug and alcohol treatment center.

C. PROJECT CHARACTERISTICS

The proposed project would be a seven-story-plus-basement building containing 194 dwelling units, including 39 affordable units, and 8,536 gsf of retail space. The ground floor would contain the retail space, residential lobby, rental office, community room, fitness center, mechanical/utility uses, and parking (see Figure 2). The second through sixth floors would contain 194 residential units (138 one-bedroom units, 49 two-bedroom units, and 7 three-bedroom units). The basement and ground floor levels would contain 181 parking spaces with access from 15th Street; 110 spaces would be independently accessible spaces, and 71 spaces would be on individual lifts. An additional 40 spaces would be provided with tandem/managed parking program available during business hours, approximately 6 a.m. to 11 p.m., for a total of about 220 available parking spaces. Figure 2 illustrates the ground floor plan, with lobby, community, retail, and parking uses.



1880 MISSION STREET
 FIGURE 2: GROUND FLOOR PLAN

SOURCE: Forum Design.

The project would include about 1,940 gsf of common open space on the street level, and the podium would have 9,885 gsf of common space. Thirty-four units would have a total of 1,224 gsf of private open space. The project would provide two off-street loading spaces with access from 15th Street. The project would include 193,588 sf of residential and common areas and 8,536 sf of retail area for a total gross floor area of 202,124 sf. Parking and mechanical space, not counted as gross floor area, would be 34,990 sf. Building elevations are depicted in Figures 3 and 4.

D. PROJECT SCHEDULE, COST, AND APPROVALS

PROJECT SCHEDULE AND COST

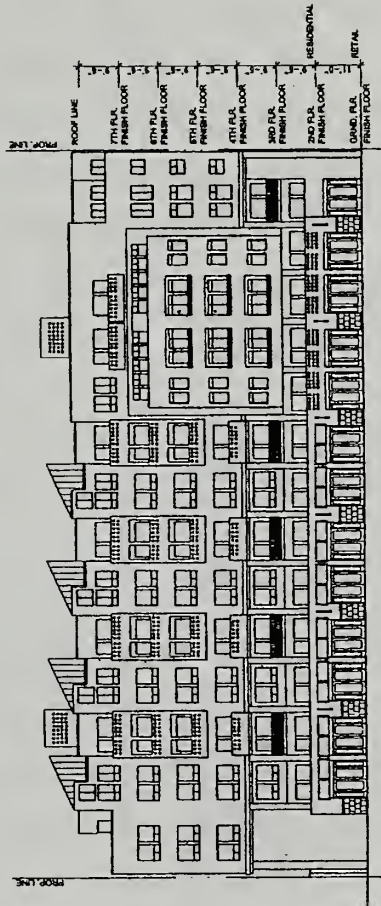
ARMAX expects environmental review, project review, and detailed design to be completed by December 2005. If the proposed project were approved and building permits issued, project construction would be anticipated to commence in January 2006. Construction would take about 14 months, with two months for demolition and excavation, 12 months for foundation construction and framing, and for interior installation. Occupancy is planned in 2007. Demolition, site preparation, and construction costs are estimated at about \$35 million (2005 dollars). The project architect is Forum Design Ltd. of San Francisco.

APPROVAL REQUIREMENTS

The project site is in a Heavy Commercial zoning district (C-M), and within a 65-B/50-X Height and Bulk district, as well as the Mission District Interim Controls district. The project would require Conditional Use authorization for a Planned Unit Development (PUD), for the following reasons: for dwelling units in a C-M zoning district; for a bulk exception; for development on a site larger than 40,000 sf; and because the project proposes to provide less than 25 percent of its housing units as affordable housing. The Department of Building Inspection would require building permits for the proposed demolition of two existing buildings and construction of one new building.



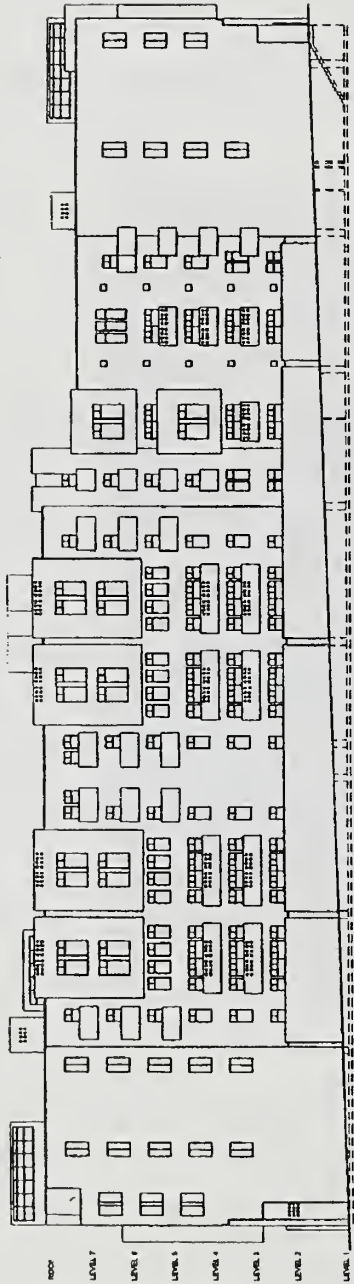
15 TH STREET ELEVATION



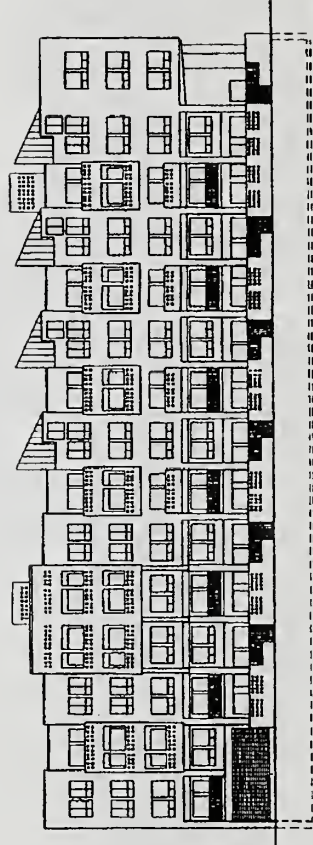
MISSION STREET ELEVATION

1880 MISSION STREET
 FIGURE 3: 15TH STREET AND MISSION STREET ELEVATIONS

SOURCE: Forum Design.



INTERIOR LOT LINE ELEVATION



JULIAN STREET ELEVATION

1880 MISSION STREET
 FIGURE 4: INTERIOR LOT LINE AND JULIAN STREET ELEVATIONS

SOURCE: Forum Design.

III. ENVIRONMENTAL SETTING AND IMPACTS

On the basis of an Initial Study published on April 23, 2005, the San Francisco Planning Department determined that an Environmental Impact Report (EIR) was required. The Initial Study determined that the following effects of the project would either be insignificant or would be reduced to a less-than-significant level by mitigation measures included as a part of the project and thus required no further analysis: compatibility with existing zoning and plans; land use; visual quality; population; transportation; noise; air quality, shadow, wind, utilities/public services; biology; geology/topography; water; energy/natural resources; hazards; and archeological resources. Therefore, the EIR does not discuss these issues. The Initial Study found the potential for significant environmental effects in the area of historic architectural resources, specifically the environmental effects associated with the proposed demolition of the Louis Roesch Company building located at 1886 Mission Street. (The Initial Study is included as Appendix A of this report.)

A. ARCHITECTURAL RESOURCES

SETTING

This chapter is based on documentation from three sources: the *Primary Record and the Building, Structure, and Object Record for 1886-1898 Mission Street*, prepared in April 2004 by the San Francisco Planning Department (Planning Department Record); McGrew/Architecture, *Analysis of Historic Resource Potential: Roesch Building, 1886-98 Mission Street, San Francisco, California 94103*, September 1, 2004 (McGrew Report); and Michael Corbett, *Louis Roesch Company Building, 1886 Mission Street; Discussion of Historical Significance*, memorandum May 20, 2005 (Corbett Memo). Those documents are on file and available for public review by appointment at the Planning Department, 1660 Mission Street, San Francisco.

PROJECT SITE

Two buildings currently occupy the project site: the 1886 Mission Street building, built in 1906 as the Louis Roesch Company printing plant, and a 1951 addition to the west.

Construction of the Louis Roesch Company building began shortly after the April 1906 earthquake and fire that devastated much of San Francisco. The building was designed by Emil A. Hermann, an architect who practiced in San Francisco from 1892 to 1917. Figures 5 and 6 are exterior photos of the existing Roesch Building. An illustration of the Roesch Building as it appeared in 1906 is shown in Figure 7.

The existing structure was built to contain multiple uses that resulted in a hybrid mixed-use building composed of two distinct plan elements. The portion of the building that fronts along Mission Street, the east façade, is 120 feet wide, approximately 39 feet tall, and about 35 feet deep, built of a simplified variation on the standard wood frame construction. The exterior walls are two-by-eight-inch framing with no exterior sheathing, covered with stamped sheet tin. Above this portion of the building is a flat roof that is concealed by a parapet composed of curved and stepped elements (see Figure 5a). The Mission Street façade features articulated end bays at the parapet and top floor. These end bays do not correlate with the structural system expressed on the lower floor. The parapet is stepped at the end bays and curved in the center bay. Both the parapet and the upper story are covered with pressed tin sheets, approximately two feet high by six feet wide, that are intended to simulate brick masonry. This building uses two patterns of pressed tin on the primary (Mission Street and 15th Street) façades and corrugated sheet metal on the west and north façades that front the on-site parking.

The upper floor and the parapet are separated by a slightly projecting sheet metal cornice supported by two sets of three brackets each. Glazing on the upper level consists of paired sets of one-over-one double-hung windows with wooden sash and sills. A single one-over-one window is centered over the Mission Street entrance. All of these windows are trimless. The lower portion of the structure contains the building entrance, centered on the front façade, flanked by three former retail spaces with mezzanines on each side of the entrance; above are “Club Rooms” that were originally used for assembly purposes. The ground floor is divided



a. Mission Street, Front (East) Elevation



b. 15th Street, South Elevation

SOURCE: McGrew / Architecture

1880 MISSION STREET
FIGURE 5: EXISTING MISSION STREET AND 15TH STREET ELEVATIONS



a. Interior Lot Line, North Elevation



b. West Elevation Near Julian Street

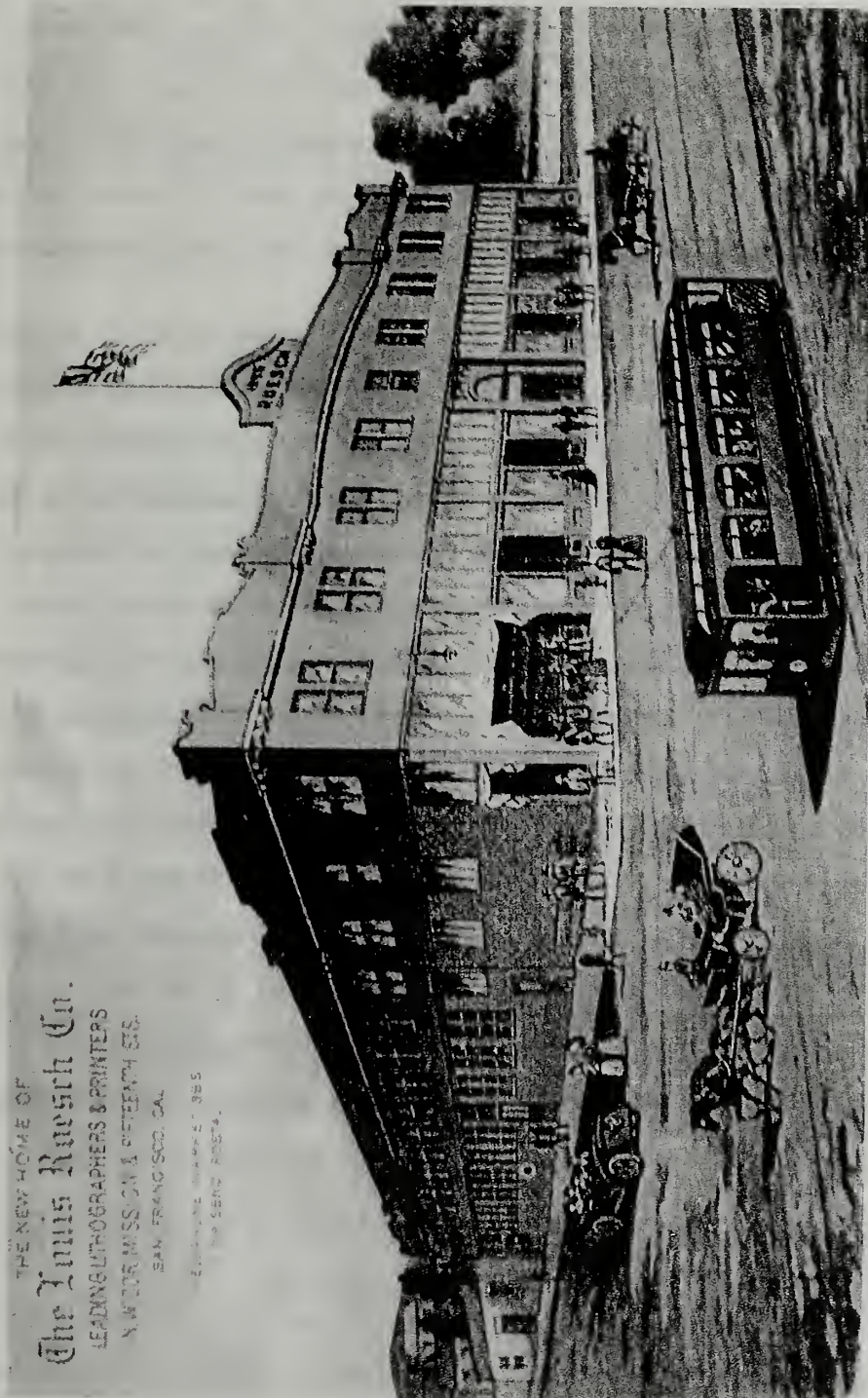
SOURCE: McGraw / Architecture

1880 MISSION STREET

FIGURE 6: EXISTING NORTH ELEVATION AND WEST ELEVATION NEAR JULIAN STREET

THE NEW HOME OF
The Louis Roesch Co.
LEADING LITHOGRAPHERS & PRINTERS
N. W. COR. MISSION ST. & FIFTEENTH STS.
SAN FRANCISCO, CAL.

— ESTABLISHED 1842 —
— THE SENG POSTAL —



SOURCE: McGraw / Architecture

1880 MISSION STREET

FIGURE 7: 1906 ADVERTISEMENT FOR "THE NEW HOME OF THE LOUIS ROESCH CO."

into six equal structural bays centered on a smaller entrance bay. The six retail storefronts feature a low base (not original) surmounted by plate glass windows, a horizontal muntin, spandrel or signboard, with a multi-paned transom above, all framed in wood. Engaged columns at each end are stucco-covered. The columns flanking the entry are of buff brick that does not appear to be original. Although the façade is essentially symmetrical about its center line, the storefronts are not alike, and none has an entry door; the retail shop entrances, doorways, mezzanines and demising walls were removed in 1942 and the spaces converted to industrial use.

The portion of the building that fronts along 15th Street, the south façade, is 156 feet wide, 39 feet tall, and about 120 feet deep. This is a tall, single-story industrial space used as a printing and lithography shop. It is built of heavy-timber construction with a pitched roof composed of four bays running parallel to 15th Street; portions of the north wall are unreinforced masonry. The southernmost bay is the full height of the façade; the three remaining bays are one story in height. Roofing for these bays is varied, with hipped roofs at the east end and gable roofs at the west end. As with the Mission Street façade, the 15th Street façade is roughly symmetrical and features articulated end bays (see Figure 5b). The lower level of this façade is faced with pressed tin in a pattern that resembles large masonry blocks. This façade also accommodates two recessed loading docks. At the first floor, paired sets of tall windows that originally brought illumination to the industrial space were replaced with Masonite in 1958. Non-original replacement glazing on most of the building's upper level consists of paired sets of one-over-one double-hung windows with aluminum sash. The upper portion of the north façade is covered with the stamped tin, while the balance of this façade, as with west façade, is covered in corrugated sheet metal.

The 1951 addition to the printing plant on the western part of the site is a simple concrete structure that does not exhibit a specific architectural character.

Building Condition

According to the McGrew Report, a number of elements of the Roesch Building appear to be in deteriorated condition:

- On the primary façades, the metal system appears to be badly deteriorated.
- Substantial water intrusion behind the sheet tin has resulted in deterioration to both the tin wall surface and the interior structural members.
- As noted above, non-original windows have replaced many upper level window materials.

No further, formal evaluation of the building's structural condition has been completed.

Architectural Style

The Planning Department Record concluded that the Roesch Building was an example of the Mission Revival style, one of three such commercial examples in the Inner Mission North Study area (discussed below). The Mission Revival Style, generally seen in the 1890s to about 1915, was characterized by plain stucco walls; arched openings; tile roofs of low pitch; scalloped parapets or gable ends; quatre-foil windows; and limited ornament. The McGrew Report, however, concluded of the Roesch Building that “stylistically, the details of the cornice recall the Craftsman style, although the building’s overall style might be best described as described as ‘vernacular,’” reflecting the building’s construction as a industrial structure quickly erected after the earthquake. The Craftsman Style, also generally seen in the 1890s to about 1920, was typically a residential style. The Roesch Building exhibits Craftsman characteristics with simple, box-like shapes; and exposure of some structural elements; and a range of sheathing materials.

Historic Context

Built on a site that was cleared by the events of April 1906, the building has been owned and occupied during its entire history by a lithographer, the Louis Roesch Company, for whom it was built. The company was one of more than 50 major San Francisco lithographic firms in this part of the 20th century. Prior to the events of April 1906, the Roesch Company had occupied a building on Sacramento Street in the Financial District. Various tenants of the Roesch Building included Brehm’s Restaurant, a saloon, plaster works, offices, and fraternal and social clubs associated with the German community in San Francisco.

The building's construction history may be summarized as follows: Although originally built as a mixed-use building, by 1942 the space occupied by all of the building's tenants had been absorbed by the Roesch Company, and the demising walls between the commercial and the industrial uses was removed. By 1958, the building's industrial use was further established by the boarding up of all of the street-level windows along 15th Street. In 1972, the building was damaged when it was rammed by a motor vehicle. Records also indicate that at least two fires caused substantial damage to the building. The building is presently occupied by printing operations, employing about 12 persons.¹

PROJECT VICINITY

The project site is in the Mission District of San Francisco. First developed during the Spanish/Mexican era (1776-1846), a small community surrounded Mission Dolores at what is now 16th and Dolores Streets. By the end of the 19th century, the city and its major neighborhoods had expanded considerably, and the Mission District became a combination of undeveloped and developed land.

As a result of the fire following the April 1906 earthquake, all buildings in the project vicinity burned down. A post-earthquake construction boom began after the 1906 earthquake, and over half of the buildings now in the project vicinity date to the 1906-1920 period and were built in a late Victorian architectural style. Generally, these structures were three to four stories, with architectural details such as bay windows, wooden-sash, double-hung windows, cornices with dentils, false-front parapets, turned columns at the entrances and other wood detailing, and multi-colored paint schemes. Much of this development was residential in nature, particularly along 14th and Guerrero Streets, with some mixed residential/commercial buildings on 15th and Valencia Streets. The State Armory and Arsenal building at 1800 Mission Street, on the north side of the project block, went up at this time.

Another 25 percent of the buildings seen today in the project vicinity were constructed in the 1920s. Most of these were residential/commercial or commercial uses, located on scattered open lots throughout the area. In general, development dating to this period consisted of attached buildings, three to five stories in height, designed in late Victorian or early Modern

¹ Warner H. Schmalz, AIA, Forum Design Ltd., email communication to EIP Associates, April 29, 2005.

styles. Early Modern architecture exhibits far less embellishment and is often of stucco or brick with wood trim.

The economic downturn of the Depression and the outbreak of World War II dampened the building expansion of earlier years. Only three structures, of one- or two-story Modern commercial design, were constructed between 1930 and 1945. Having filled all available lots, these buildings represent the end of the post-1906 redevelopment of the area.

Construction of new buildings in the area around the project site did not begin again until about 1960. Since then, a series of mostly small residential buildings have been constructed on lots in the area that previously held other structures. Today, development continues as primarily residential infill. The character of the project vicinity continues to be residential with some residential/commercial or commercial uses, three to five stories in height, designed in primarily late Victorian style with some early Modern and Modern styles.

HISTORIC PRESERVATION REGULATIONS AND CRITERIA

National Register of Historic Places

The National Register of Historic Places is the nation's master inventory of known historic resources. The National Register is administered by the National Park Service and includes listings of buildings, structures, sites, objects, and districts that possess historic, architectural, engineering, archeological, or cultural significance at the National, State, or local level.

Structures, sites, buildings, districts and objects over 50 years of age can be listed on the National Register as significant historic resources. However, properties under 50 years of age that are of exceptional importance or are contributors to a district can also be included on the National Register. The criteria for listing on the National Register include resources that:

- A) are associated with events that have made a significant contribution to the broad patterns of history,
- B) are associated with the lives of persons significant in our past,
- C) embody the distinctive characteristics of a type, period, or method of construction, or that represent the work or a master, or that possess high artistic values, or that represent a significant and distinguishable entity whose components may lack individual distinction, or

D) have yielded or may likely yield information important in prehistory or history.

California Register of Historical Resources

The California Register of Historical Resources includes buildings and structures formally determined eligible and/or listed through procedures adopted by the State Historic Preservation Office, and also includes buildings previously determined eligible for listing on the National Register. The Roesch Building would be considered listed on the California Register if formally determined to be eligible for the National Register. The State Armory and Arsenal, by virtue of its listing in the National Register, is also listed in the California Register.

1976 Department of City Planning Citywide Survey

Between 1974 and 1976, the San Francisco Planning Department conducted a citywide inventory of the City's approximately 170,000 structures to determine their architectural importance. The physical appearance of both contemporary and older buildings were surveyed, but historical associations were not included in the study. An advisory review committee of architects and architectural historians determined that 10,000 of these buildings were eligible for inclusion in the survey based upon various factors, including architectural design, urban design context, and overall environmental significance. These buildings represent roughly 10 percent of the City's entire building stock. Buildings included in the survey are rated from a low of '0,' contextually significant, to a high of '5,' highest overall significance. The Roesch Building is not listed in the Citywide inventory. In the estimation of the inventory participants, buildings rated "3" or higher represent approximately the best 2 percent of the City's architecture.

Article 10 of the City Planning Code

Article 10 of the City Planning Code provides for designation of landmark buildings and prevents the unnecessary destruction of "structures, sites, and areas of special character or special historical, architectural, or aesthetic interest or value." The Roesch Building is not a designated landmark in Article 10. The State Armory and Arsenal is listed in Article 10 and is on the project block on 14th Street. As Article 10 is an adopted local register of historic

resources, the State Armory and Arsenal is considered a historical resource for the purposes of CEQA.

SIGNIFICANCE OF THE ROESCH BUILDING

The Roesch Building is within the survey boundaries of the Inner Mission North (IMN) Cultural Resources Survey Area prepared by the San Francisco Planning Department. Conducted in October 2002 through September 2003, the IMN survey inventoried and evaluated 420 properties in the Inner Mission neighborhood to determine their eligibility for listing on the National Register of Historic Places. Of the two existing structures on the project site, the Roesch Building and the 1951 addition to the west, the Roesch Building was assigned a California Historical Resource Code of 3CS, indicating that, based upon “the building’s architecture and building construction technology,” it appears to be eligible for individual listing on the National Register under Criterion C, Design/Construction. The Planning Department’s determination of eligibility is based on the building’s architecture employing what is judged to be an unusual construction type for San Francisco, specifically its use of embossed metal sheeting as siding material. The study also determined that the Roesch Building is one of three Mission Revival commercial buildings in the IMN survey area.

The San Francisco Planning Department concluded that the Roesch Building is eligible for listing on the National Register of Historic Places under Criterion C, due to the building’s architecture and building construction technology which represent the distinctive characteristics of a type, period, or method of construction.

According to the Planning Department Record, in terms of integrity, the property is in its original location and continues to be used for its original purpose of industrial printing. Although deferred maintenance of the building over a long period has led to the deterioration of certain elements of the structure, the National Park Service, the California Office of Historic Preservation, as well as the IMN survey make a distinction between *integrity* and *physical condition*. Extant but decayed character defining features are considered to be contributory to the significance of a property. In the case of the Roesch Building, the character defining features of the building that are relevant to express its historic significance are substantially present. Character defining features of the Roesch Building include, but may

not be limited to, siting and relationship of the building to the street; wood and pressed metal cladding; windows and doors, including fenestration pattern, transoms, surrounds, and glazing; and elements such as the shaped parapet and projecting cornice.

The McGrew Report concluded that the Roesch Building cannot be considered eligible for the National Register, because to be eligible under Criterion C, the property must embody the distinctive characteristics of a type, period, or method of construction; represent the work of a master; or possess high artistic values. The McGrew study concluded that the Roesch Building:

belongs to a class of structures hastily erected to serve the immediate needs of San Francisco after the earthquake and fire of 1906. This building, like many others, was designed to accomplish specific programmatic goals for which there was an immediate need. Key elements of the building's original design have been lost through subsequent alterations and the majority of surviving original elements are now deteriorated beyond repair. The 1906 rush to provide ample square footage for multiple tenants resulted in a building whose architectural design components were a jumbled or random mixture of styles and details, combined with least expensive materials available, an example of 'haste makes waste.' The resulting building is without architectural and/or historical significance, except as a marker of the times, a characteristic it shares with some 53% of the non-residential buildings found within the survey area. Rather than existing as an example of 'architecture and building technology' as indicated by the [IMN survey] Building Structure and Object Record, it fails on those grounds. It has little in common with the more significant structures from the period that better represent the post-quake reconstruction era. As it was originally conceived, and as it exists today, it does not illustrate through its characteristics, a pattern of features common to the post-quake era of non-residential buildings found within the survey area, thus failing the definition of eligibility for listing on the [California and National] Registries.

The McGrew report argues that the use of metal sheeting was not an aesthetic decision, as stated on the IMN survey documentation, but rather an economic decision to use the least expensive materials possible. Sheet tin, that report states, was, in most cases, the equivalent of today's asbestos siding. The McGrew report further argues that the Roesch Building lacks the fundamental elements of the Mission Revival style, including stucco walls and clay tile roofing, and, in addition that the two buildings within the IMN survey area that the Planning Department groups with the Roesch Building do not bear a factual resemblance to the Mission Revival style. The McGrew report also finds that building is deteriorated, particularly regarding the elements that arguably lend it historic character.

The Corbett Memo provides further information on the Roesch Building's architect, Emil A. Hermann; and its association with several themes and events important to the history of San Francisco, including the period that followed the earthquake and fire of 1906, the printing industry, organized labor, fraternal and benevolent organizations, and the city's German community.

In terms of design and construction, the Corbett Memo identifies the Roesch Building as a "distinctive example of a typical form of construction," which, like many buildings constructed since the Gold Rush, employed timber construction and sheet metal cladding for protection against fire. What was unusual about the Roesch Building, Corbett argues, was the use of pressed metal on the street façades, rather than less expensive corrugated metal, and that the use of pressed metal represents an attempt to create an appearance that was more compatible with the surrounding mixed neighborhood of homes and businesses. Corbett agrees that the building was probably constructed rather hastily in the rush the earthquake and fire. Nevertheless, Corbett finds the building's mixture of office, commercial, industrial, and communal uses to be highly unusual.

Corbett cites Emil A. Hermann's issuance of an architect's license in 1901 "without examination" as evidence of "his status as a respected architect." Hermann, a California-born son of German-immigrants, had strong connections to San Francisco's German community. These connections formed a link between the Roesch Building, the German-dominated printing industry of the 19th and early 20th centuries, and the fraternal and labor organizations that used the Roesch Building for meetings. The Roesch Building was, according to Corbett,

a focal point of Germans in San Francisco. The owner, Louis Roesch, was born in Germany. His business benefited from his German friends.... The architect, Emil Hermann, was the oldest child of German-born parents, and derived a substantial part of his business from clients with German surnames.

The Corbett Memo also identifies the building's association with the history of the printing industry; fraternal groups; labor organizations, and the German immigrant community in the San Francisco:

- As documented by the California Historical Society, printing was an important San Francisco industry since the Gold Rush. A substantial number of major

nineteenth and early twentieth century printing companies were owned by German immigrants, including Schmidt Lithograph, Strecher-Traung, Weiss Printing, Schwabacher Frey, and the Louis Roesch Company. Because of their heavy, vibrating equipment, printing companies required heavily built structures, and usually occupied their own buildings without other tenants. Many printing companies, including Louis Roesch, were located north of Market Street before 1906. After the earthquake, many moved to larger sites south of Market Street. The printing industry was largely destroyed by the earthquake. Information on four printing plants built in 1906 (Union Lithograph, H.S. Crocker, Danner, and Louis Roesch), as well as numerous plants built after 1906 through the 1920s, show that only the Louis Roesch Company was built of wood and sheet metal and only the Louis Roesch Company was built with non-printing industry uses.

- Fraternal and benevolent organizations played a major role in the cultural life of the city in that era, from the largest and best-known groups like the Masons and the Odd Fellows to small groups, often based on national or ethnic origin, with narrower memberships. The earthquake destroyed the meeting rooms and buildings of these groups.

The Roesch Building provided meeting rooms for several small fraternal and labor groups including the Grand Forester's Society of the Ancient Order of Foresters, the Hassen Verein, and the Boilermaker's Union. Directories listed Roesch Hall and Germania Hall at this address. Roesch Hall appears to be another name for the building, while Germania Hall may refer to facilities for a specific organization.

- In 1906, the mayor of San Francisco, Eugene Schmitz, represented the Union Labor Party. San Francisco was a strong labor city with many union members. The Mission District was a largely working class neighborhood with a disproportionate share of union members and halls for union locals. The Roesch Printing Company itself probably employed over a hundred workers at a time for much of its existence. The Boilermaker's Union local rented space in the building.
- The Roesch Building was a focal point of the German community in San Francisco. The owner, Louis Roesch, was born in Germany. His business benefited from his German friends, among them the Beringer family, whose Napa Valley winery ordered the printing of many labels. The architect, Emil Hermann, was the oldest child of German-born parents, and derived a substantial part of his business from clients with German surnames. The early commercial tenants, who ran a saloon and restaurant, Adam Brehm, Atto Koch, and Antun Weibel, were all born in Germany. The upstairs tenants included Germania Hall and the Hassen Verein.

As noted above, information on the design, history, and significance of the Roesch Building is based on three sources cited in this EIR. The studies provide a range of conclusions as to the significance of the building under National Register criteria. The McGrew report concludes

that based on its assessment, the proper designation for the building is a 6Z. A 6Z means that the property is “ineligible for National Register, California Register or Local designation through survey evaluation.” While there is a disagreement among the sources, the Planning Department Record concludes that the building meets at least one of the National Register criteria. The Planning Department Record also notes that the National Register eligibility of the Roesch Building was:

- Determined by professionally trained Planning Department staff;
- Reviewed by the Survey Advisory Committee — a panel of experts from the preservation community consisting of Planning Department staff, members of the Landmarks Preservation Advisory Board, and working professionals from the larger preservation community;
- Endorsed by the Landmarks Preservation Advisory Board;
- Accepted by the State Office of Historic Preservation; and
- Incorporated into the State’s California Historic Resource Inventory System.

On April 7 and 21, 2004, the Landmarks Preservation Advisory Board held public hearings on the property owner’s request to evaluate the Planning Department’s conclusions on the significance and the assigned status code. At the hearing, the LPAB adopted a revised evaluation of the building that specifically cited the design and construction of an industrial building with sheet-metal sheathing, with a assigned code of 3CS. The Planning Commission held a hearing on February 17, 2005 to review the LPAB determination to uphold the Planning Department rating of 3CS. After taking testimony and reviewing the Planning Department and McGrew reports, the Commission voted 5-2 to redesignate the building as 6L, which means “ineligible for local listing or designation through local government review process; may warrant special consideration in local planning.”

The CEQA Guidelines include the following definition of an “historical resource.”

Any object, building, structure, site, area, place, record, or manuscript which a lead agency determines to be historically significant or significant in the architectural, engineering, scientific, economic, agricultural, educational, social, political, military, or cultural annals of California may be considered to be an historical resource, provided the lead agency’s determination is supported by substantial evidence in light of the whole record (Public Resources Code, Section 21084.1; CEQA Guidelines, Section 15064.5).

Therefore, while there is disagreement among the sources regarding its significance, this EIR concludes that the Roesch Building is an “historical resource” as defined under CEQA.

IMPACTS

SIGNIFICANCE CRITERIA

A project is normally found to have a significant effect on architectural resources if it will substantially disrupt or substantially adversely affect a property that has been determined to be an historical resource as per CEQA Section 21084.1 and CEQA Guidelines Section 15064.5. CEQA states that “a project that may cause a substantial adverse change in the significance of an historical resource is a project that may have a significant effect on the environment.” This section further defines a “historical resource” as one that is listed in, or determined eligible for listing in, the California Register of Historical Resources. In addition, a resource that (i) is identified as significant in a local register of historical resources, such as Article 10 and Article 11 of the San Francisco Planning Code, or (ii) is deemed significant due to its identification in an historical resources survey meeting the requirements of Public Resources Code Section 5024.1(g), is presumed to be historically significant unless a preponderance of evidence demonstrates otherwise. A “substantial adverse change” is defined in Public Resources Code Sec. 5020.1 as “demolition, destruction, relocation, or alteration such that the significance of an historical resource would be impaired.”

DEMOLITION OF THE ROESCH BUILDING

The Roesch Building at 1886 Mission Street was constructed in 1906 and is located within the survey boundaries of the Inner Mission North Cultural Resources Survey Area. Based on that survey, the Planning Department found that the Roesch Building is eligible for individual listing on the National Register of Historic Places under Criterion C, Design/Construction. For the purposes of CEQA, the Roesch Building is treated in this EIR an “historical resource.” Therefore, the demolition of the Roesch Building would be “deemed significant” per CEQA Section 21084.1. The proposed project would demolish two existing buildings on the proposed project site: the Roesch Building and a 1951 addition to the west. Demolition of

the Roesch Building would be a significant adverse effect of the proposed project on cultural resources.

Chapter VI, Alternatives to the Proposed Project, includes Alternative B that would preserve the Roesch Building as part of the project.

OTHER HISTORIC RESOURCES

The proposed project would demolish the two existing building on the block bounded by Mission, Julian, 14th, and 15th Streets. There would be no other direct impacts to historic resources or potential historic resources in the project vicinity. There would be no direct or indirect impacts to the State Armory and Arsenal or other landmark buildings designated under Article 10 of the City Planning Code. However, the potential exists for indirect impacts to adjacent sites attributable to demolition and construction activities for the proposed project. As the proposed project site is bounded on three sides by streets (Mission, Julian, and 15th Streets), the project site is set back from other sites and at such a distance there would be a very low possibility of any impacts from construction activities associated with the proposed project.

B. GROWTH INDUCEMENT

In general, a project would be considered growth-inducing if its implementation would result in substantial population increases and/or new development that might not occur if the project were not approved and implemented. The proposed project, as residential/retail development, would not be expected to substantially alter development patterns in San Francisco. The introduction of 194 dwelling units, retail, and parking space to the project site, currently occupied by a printing plant space, would not generate substantial population growth or concentration in the neighborhood, city or region. Located in an urban area, the project would not necessitate or induce the extension of municipal infrastructure. In view of the above, there is no reason to believe that the project would result in additional development in the project site vicinity that would not otherwise occur. The project would not induce substantial growth of population in the project vicinity, given the dense urban nature of the area.

IV. MITIGATION MEASURES AND IMPROVEMENT MEASURES

In the course of project planning and design, measures have been identified that would reduce or eliminate potential environmental impacts of the project. These measures have been adopted by the project sponsor and, therefore, are proposed as part of the project. Mitigation measures identified in this Preliminary Draft EIR or in the Initial Study are discussed below. If a mitigation measure that was included in the Initial Study has been revised since the publication of the Initial Study, changes to the measures are indicated in underline. (The Initial Study is included as Appendix A.) Mitigation measures identified in this Preliminary Draft EIR and in the Initial Study would be required by decision makers as conditions of project approval unless they are demonstrated to be infeasible based on substantial evidence in the record.

A. MITIGATION MEASURES

As discussed in Section III.A, *Architectural Resources*, for the purposes of CEQA, the Roesch Building is treated in this Preliminary Draft EIR as an historic resource, and its demolition would be a significant unavoidable impact on cultural resources. This significant unavoidable impact would be reduced (though not eliminated) through the implementation of the following mitigation measures:

ARCHITECTURAL RESOURCES

1. Prior to any physical removal of buildings or site features, the project sponsor would prepare, or cause to be prepared, documentation of the Roesch Building. Such documentation would include the precise recording of the structure through measurements, drawings, and photographs and would meet the Historic American Buildings Survey (HABS) recordation standards. The HABS documentation would include the following:
 - A HABS outline report would be prepared and would include descriptive and historical information about the building and its architect. Information from the previous reports prepared for the Roesch Building, including the Primary Record and the Building, Structure, and Object Record prepared by the San Francisco Planning Department for the IMN Cultural Resources Survey Area and McGrew / Architecture, *Analysis of Historic Resource Potential: Roesch Building, 1886-98 Mission Street, San Francisco, California 94103*,

September 1, 2004 would be used to fulfill some of the requirements for descriptive and historical information.

- Photographic documentation of the exterior of the Roesch Building and its neighborhood setting would be prepared.
 - Photographic documentation of selected interiors, including a portion of the printing plant would be prepared. The selected portion would be appropriately described in the outline report and keyed to the photographs.
 - All photographic documentation would follow the HABS Photographic Standards for detail and quality, use of large format photographs and negatives, archival processing, labeling, and sacrificial test prints. Two sets of archival prints and one set of archival negatives would be prepared.
 - Existing architect's drawings of the Roesch Building would be included in the HABS documentation. Reference would be made in the documentation report to the repository where the drawings are housed.
2. The documentation of the Roesch Building would be submitted to the following repositories:
- Documentation report, one set of photographs and negatives, and a copy of the original drawings (identified in the Appendix II of *Draft Historic Significance Evaluation of the Roesch Building* as "Original Drawings for the Roesch Building by Emil A. Hermann") would be submitted to the History Room of the San Francisco Public Library.
 - Documentation report would be submitted to the Northwest Information Center of the California Historical Resources Information Resource System.
 - Documentation report, one set of photographs, and original drawings would be submitted to the Environmental Design Archives, in the College of Environmental Design, University of California, Berkeley. The original drawings are identified in the Appendix II of *Draft Historic Significance Evaluation of the Roesch Building* as "Original Drawings for the Roesch Building by Emil A. Hermann."
 - The documentation report and xerographic copies of the photographs would be submitted to the San Francisco Planning Department for review prior to issuance of any permit that may be required by the City and County of San Francisco for demolition of the Roesch Building.
 - The documentation report and xerographic copies of the photographs would be submitted to the San Francisco Landmarks Preservation Advisory Board.

3. The project sponsor would provide a publicly accessible interpretive display area on the project site to include interpretive materials, such as photographs, oral histories, architectural drawings and site plans, and written histories documenting the lives of, and events associated with, past occupants of the Roesch Building. The interpretive display would be submitted to the San Francisco Landmarks Preservation Advisory Board (LPAB) for review and approval prior to issuance of a final certificate of occupancy for the project. Copies of all interpretive materials shall also be donated to the History Room of the San Francisco Public Library. The LPAB may appoint a liaison to work with the project sponsor in directing the research on the interpretive materials.

AIR QUALITY

4. The project sponsor shall require the contractor(s) to spray the site with water during demolition, excavation, and construction activities; spray unpaved construction areas with water at least twice per day; cover stockpiles of soil, sand, and other material; cover trucks hauling debris, soils, sand or other such material; and sweep surrounding streets during demolition, excavation, and construction at least once per day to reduce particulate emissions.

Ordinance 175-91, passed by the Board of Supervisors on May 6, 1991, requires that non-potable water be used for dust control activities. Therefore, the project sponsor shall require the contractor(s) to obtain reclaimed water from the Clean Water Program for this purpose. The project sponsor shall require the project contractor(s) to maintain and operate construction equipment so as to minimize exhaust emissions of particulates and other pollutants, by such means as a prohibition on idling motors when equipment is not in use or when trucks are waiting in queues, and to implement specific maintenance programs to reduce emissions for equipment that would be in frequent use for much of the construction period.

HAZARDS

5. Contaminated Soil and Underground Storage Tank Removal

- a: Determination of Presence of Lead-Contaminated Soil

Prior to approval of a building permit for the project, the project sponsor shall hire a consultant to collect soil samples (borings) from areas on the site in which soil would be disturbed and test the soil samples for total lead. The consultant shall analyze the soil borings as discrete, not composite samples.

The consultant shall prepare a report on the soil testing for lead that includes the results of the soil testing and a map that shows the locations of stockpiled soils from which the consultant collected the soil, samples.

The project sponsor shall submit the report on the soil testing for lead and a fee of \$425 in the form of a check payable to the San Francisco Department of Public Health (SFDPH), to the Hazardous Waste Program, Department of

Public Health, 101 Grove Street, Room 214, San Francisco, California 94102. The fee of \$425 shall cover five hours of soil testing report review and administrative handling. If additional review is necessary, DPH shall bill the project sponsor for each additional hour of review over the first five hours, at a rate of \$85 per hour. These fees shall be charged pursuant to Section 31.47(c) of the San Francisco Administrative Code. DPH shall review the soil testing report to determine to whether soils on the project site are contaminated with lead at or above potentially hazardous levels.

If DPH determines that the soils on the project site are not contaminated with lead at or above a potentially hazardous level (i.e., below 50 ppm total lead), no further mitigation measures with regard to lead-contaminated soils on the site would be necessary.

The project sponsor shall implement one of several options for closure of the underground storage tanks. These include in-place closure as well as excavation and removal of the tanks. Under either closure method, DPH would require further characterization of the soil. Remedial actions associated with the underground tanks at the project site, if required by DPH, shall be performed concurrently or shortly following site demolition.

b: Preparation of Site Mitigation Plan

If based on the results of the soil tests conducted, DPH determines that the soils on the project site are contaminated with lead at or above potentially hazardous levels, the DPH shall determine if preparation of a Site Mitigation Plan (SMP) is warranted. If such a plan is requested by the DPH, the SMP shall include a discussion of the level of lead contamination of soils on the project site and mitigation measures for managing contaminated soils on the site, including, but not limited to: 1) the alternatives for managing contaminated soils on the site (e.g., encapsulation, partial or complete removal, treatment, recycling for reuse, or a combination); 2) the preferred alternative for managing contaminated soils on the site and a brief justification; and 3) the specific practices to be used to handle, haul, and dispose of contaminated soils on the site. The SMP shall be submitted to the DPH for review and approval. A copy of the SMP shall be submitted to the Planning Department to become part of the case file.

c: Handling, Hauling, and Disposal of Lead-Contaminated Soils

i. Specific Work Practices: If based on the results of the soil tests conducted, DPH determines that the soils on the project site are contaminated with lead at or above potentially hazardous levels, the construction contractor shall be alert for the presence of such soils during excavation and other construction activities on the site (detected through soil odor, color, and texture and results of on-site soil testing), and shall be prepared to handle, profile (i.e., characterize), and dispose

of such soils appropriately (i.e., as dictated by local, state, and federal regulations, including OSHA lead-safe work practices) when such soils are encountered on the site.

- ii. Dust Duppression: Soils exposed during excavation for site preparation and project construction activities shall be kept moist throughout the time they are exposed, both during and after work hours.
- iii. Surface Water Runoff Control: Where soils are stockpiled, visqueen shall be used to create an impermeable liner, both beneath and on top of the soils, with a berm to contain any potential surface water runoff from the soil stockpiles during inclement weather.
- iv. Soils Replacement: If necessary, clean fill or other suitable material(s) shall be used to bring portions of the project site, where lead-contaminated soils have been excavated and removed, up to construction grade.
- v. Hauling and Disposal: Contaminated soils shall be hauled off the project site by waste hauling trucks appropriately certified with the State of California and adequately covered to prevent dispersion of the soils during transit, and shall be disposed of at a permitted hazardous waste disposal facility registered with the State of California.

d: Preparation of Closure/Certification Report

After excavation and foundation construction activities are completed, the project sponsor shall prepare and submit a closure/certification report to DPH for review and approval. The closure/certification report shall include the mitigation measures in the SMP for handling and removing lead-contaminated soils from the project site, whether the construction contractor modified any of these mitigation measures, and how and why the construction contractor modified those mitigation measures.

ARCHAEOLOGICAL RESOURCES

6. Based on a reasonable presumption that archeological resources may be present within the project site, the following measures shall be undertaken to avoid any potentially significant adverse effect from the proposed project on buried or submerged historical resources. The project sponsor shall retain the services of a qualified archeological consultant having expertise in California prehistoric and urban historical archeology. The archeological consultant shall undertake an archeological testing program as specified herein. In addition, the consultant shall be available to conduct an archeological monitoring and/or data recovery program if required pursuant to this measure. The archeological consultant's work shall be conducted in accordance with this measure at the direction of the Environmental Review Officer (ERO). All plans and reports prepared by the consultant as specified herein shall be submitted first and

directly to the ERO for review and comment, and shall be considered draft reports subject to revision until final approval by the ERO. Archeological monitoring and/or data recovery programs required by this measure could suspend construction of the project for up to a maximum of four weeks. At the direction of the ERO, the suspension of construction can be extended beyond four weeks only if such a suspension is the only feasible means to reduce to a less than significant level potential effects on a significant archeological resource as defined in CEQA Guidelines Sect. 15064.5 (a) (c).

Archeological Testing Program. The archeological consultant shall prepare and submit to the ERO for review and approval an archeological testing plan (ATP). The archeological testing program shall be conducted in accordance with the approved ATP. The ATP shall identify the property types of the expected archeological resource(s) that potentially could be adversely affected by the proposed project, the testing method to be used, and the locations recommended for testing. The purpose of the archeological testing program will be to determine to the extent possible the presence or absence of archeological resources and to identify and to evaluate whether any archeological resource encountered on the site constitutes an historical resource under CEQA.

At the completion of the archeological testing program, the archeological consultant shall submit a written report of the findings to the ERO. If based on the archeological testing program the archeological consultant finds that significant archeological resources may be present, the ERO in consultation with the archeological consultant shall determine if additional measures are warranted. Additional measures that may be undertaken include additional archeological testing, archeological monitoring, and/or an archeological data recovery program. If the ERO determines that a significant archeological resource is present and that the resource could be adversely affected by the proposed project, at the discretion of the project sponsor either:

- a. The proposed project shall be re-designed so as to avoid any adverse effect on the significant archeological resource; or
- b. A data recovery program shall be implemented, unless the ERO determines that the archeological resource is of greater interpretive than research significance and that interpretive use of the resource is feasible:

Archeological Monitoring Program. If the ERO in consultation with the archeological consultant determines that an archeological monitoring program shall be implemented the archeological monitoring program shall minimally include the following provisions:

- The archeological consultant, project sponsor, and ERO shall meet and consult on the scope of the AMP reasonably prior to any project-related soils disturbing activities commencing. The ERO in consultation with the archeological consultant shall determine what project activities shall be archeologically monitored. In most cases, any soils-disturbing activities, such as demolition, foundation removal, excavation, grading, utilities installation, foundation work, driving of piles (foundation, shoring, etc.), site remediation, etc., shall require

archeological monitoring because of the risk these activities pose to potential archaeological resources and to their depositional context;

- The archeological consultant shall advise all project contractors to be on the alert for evidence of the presence of the expected resource(s), of how to identify the evidence of the expected resource(s), and of the appropriate protocol in the event of apparent discovery of an archeological resource;
- The archeological monitor(s) shall be present on the project site according to a schedule agreed upon by the archeological consultant and the ERO until the ERO has, in consultation with project archeological consultant, determined that project construction activities could have no effects on significant archeological deposits;
- The archeological monitor shall record and be authorized to collect soil samples and artifactual/ecofactual material as warranted for analysis;
- If an intact archeological deposit is encountered, all soils-disturbing activities in the vicinity of the deposit shall cease. The archeological monitor shall be empowered to temporarily redirect demolition/excavation/pile driving/construction activities and equipment until the deposit is evaluated. If in the case of pile driving activity (foundation, shoring, etc.), the archeological monitor has cause to believe that the pile driving activity may affect an archeological resource, the pile driving activity shall be terminated until an appropriate evaluation of the resource has been made in consultation with the ERO. The archeological consultant shall immediately notify the ERO of the encountered archeological deposit. The archeological consultant shall make a reasonable effort to assess the identity, integrity, and significance of the encountered archeological deposit, and present the findings of this assessment to the ERO.

Whether or not significant archeological resources are encountered, the archeological consultant shall submit a written report of the findings of the monitoring program to the ERO.

Archeological Data Recovery Program. The archeological data recovery program shall be conducted in accord with an archeological data recovery plan (ADRP). The archeological consultant, project sponsor, and ERO shall meet and consult on the scope of the ADRP prior to preparation of a draft ADRP. The archeological consultant shall submit a draft ADRP to the ERO. The ADRP shall identify how the proposed data recovery program will preserve the significant information the archeological resource is expected to contain. That is, the ADRP will identify what scientific/historical research questions are applicable to the expected resource, what data classes the resource is expected to possess, and how the expected data classes would address the applicable research questions. Data recovery, in general, should be limited to the portions of the historical property that could be adversely affected by the proposed project. Destructive data recovery methods shall not be applied to portions of the archeological resources if nondestructive methods are practical.

The scope of the ADRP shall include the following elements:

- *Historical Context.* Historical background of project site and of historical themes related to history of site by which to predict and evaluate historical significance of expected archeological resources.
- *Research Themes and Questions.* Significant historical/scientific research issues and specific questions to which data from the expected archeological resources would provide a consequential contribution.
- *Field Methods and Procedures.* Descriptions of proposed field strategies, procedures, and operations.
- *Cataloguing and Laboratory Analysis.* Description of selected cataloguing system and artifact analysis procedures.
- *Discard and Deaccession Policy.* Description of and rationale for field and post-field discard and deaccession policies.
- *Interpretive Program.* Consideration of an on-site/off-site public interpretive program during the course of the archeological data recovery program.
- *Security Measures.* Recommended security measures to protect the archeological resource from vandalism, looting, and non-intentionally damaging activities.
- *Final Report.* Description of proposed report format and distribution of results.
- *Curation.* Description of the procedures and recommendations for the curation of any recovered data having potential research value, identification of appropriate curation facilities, and a summary of the accession policies of the curation facilities.

Human Remains and Associated or Unassociated Funerary Objects. The treatment of human remains and of associated or unassociated funerary objects discovered during any soils disturbing activity shall comply with applicable State and Federal laws. This shall include immediate notification of the Coroner of the City and County of San Francisco and in the event of the Coroner's determination that the human remains are Native American remains, notification of the California State Native American Heritage Commission (NAHC) who shall appoint a Most Likely Descendant (MLD) (Pub. Res. Code Sec. 5097.98). The archeological consultant, project sponsor, and MLD shall make all reasonable efforts to develop an agreement for the treatment of, with appropriate dignity, human remains and associated or unassociated funerary objects (CEQA Guidelines. Sec. 15064.5(d)). The agreement should take into consideration the appropriate excavation, removal, recordation, analysis, custodianship, curation, and final disposition of the human remains and associated or unassociated funerary objects.

Final Archeological Resources Report. The archeological consultant shall submit a Draft Final Archeological Resources Report (FARR) to the ERO that evaluates the historical significance of any discovered archeological resource and describes the archeological and historical research methods employed in the archeological testing/monitoring/data recovery program(s) undertaken. Information that may put at risk any archeological resource shall be provided in a separate removable insert within the final report.

Once approved by the ERO, copies of the FARR shall be distributed as follows: California Archaeological Site Survey Northwest Information Center (NWIC) shall receive one (1) copy and the ERO shall receive a copy of the transmittal of the FARR to the NWIC. The Major Environmental Analysis division of the Planning Department shall receive three copies of the FARR along with copies of any formal site recordation forms (CA DPR 523 series) and/or documentation for nomination to the National Register of Historic Places/California Register of Historical Resources. In instances of high public interest in or the high interpretive value of the resource, the ERO may require a different final report content, format, and distribution than that presented above.

B. IMPROVEMENT MEASURES

Improvement Measures identified in this Preliminary Draft EIR or in the Initial Study to reduce effects of the project that are identified in the environmental analysis as being less-than-significant impacts are listed below.

TRANSPORTATION IMPROVEMENT MEASURES

Improvement Measure 1

During the construction period, the project sponsor would cause to limit construction truck movement to the hours between 9:00 a.m. and 3:30 p.m., or other hours if approved by the DPT, and to prohibit staging or unloading of equipment and materials during the periods of 7:00 a.m. to 9:00 a.m. and 3:30 p.m. to 6:00 p.m., to minimize peak-period traffic conflicts and to accommodate queuing of Muni buses during the peak hours of service. The project sponsor and construction contractor would meet with the Traffic Engineering Division of DPT, the Fire Department, Muni, and the Planning Department to determine feasible traffic management and mitigation measures to reduce traffic congestion during construction of this project and other nearby projects. To minimize cumulative traffic impacts due to lane closures during construction, the project sponsor would coordinate with construction contractors for any concurrent nearby projects that are planned for construction of which later become known.

Improvement Measure 2

The project sponsor would, in cooperation with Muni, install eyebolts or make provision for the direct attachment of eyebolts for Muni trolley wires on the project building whenever necessary, or agree to waive all rights to refuse the attachment of eye bolts to the project building if such attachment is done at the City's expense.

The following are improvement measures that have not been agreed to by the project sponsor but are recommended by the Planning Department.

Improvement Measure 3

If the project parking garage were to provide parking for the general public, the project sponsor shall provide an electronic "Full" sign that is clearly visible from the street outside the parking garage entrance to ensure that on-street vehicle queuing would be minimized.

Improvement Measure 4

The project would not have a considerable contribution to the significant cumulative PM peak-hour traffic impact at the intersections of 15th/Valencia Streets and 14th/Valencia Street. However, the following measures are recommended to address those cumulative effects:

The San Francisco Department of Parking and Traffic (DPT) could, if deemed appropriate at a future time, establish a separate right-turn lane on the southbound Valencia Street approach to 15th Street. The intersection level of service under cumulative (2015) conditions would improve to LOS B if this measure were implemented. This measure would require removal of on-street parking spaces on the west side of Valencia Street, and configuration of pavement markings and signs to channelize autos into the right-turn lane without substantially impeding access to the Class II bicycle lane. This measure is not required to mitigate a project impact, but rather is a measure that could be implemented by DPT to reduce impacts caused by estimated cumulative growth in traffic, to which the project would contribute.

DPT could, if deemed appropriate at a future time, modify the traffic signal phasing and timing at the 14th/Valencia Streets intersection during the PM peak period, specifically by providing a phase for southbound through and left-turn traffic only, in advance of the current phase for north-south traffic on signal phases of Valencia Street. The change in signal phasing and timing would improve the PM peak-hour traffic level of service to an acceptable (LOS D). This measure is not required to mitigate a project impact, but rather is a measure that could be implemented by DPT to reduce impacts caused by estimated cumulative growth in traffic, to which the project would contribute.

V. SIGNIFICANT ENVIRONMENTAL EFFECTS THAT CANNOT BE AVOIDED IF THE PROPOSED PROJECT IS IMPLEMENTED

In accordance with Section 21100 (b) (2) (A) and 21100.1(a) of the California Environmental Quality Act (CEQA), and Section 15126.2(b) of the State CEQA Guidelines, the purpose of this chapter is to identify significant impacts that could not be eliminated or reduced to an insignificant level by implementing mitigation measures included as part of the project or by other mitigation measures that could be implemented, identified in Chapter IV, *Mitigation Measures and Improvement Measures*. This chapter is subject to final determination by the Planning Commission as part of the certification process for the EIR. If necessary, this chapter will be revised in the Final EIR to reflect the findings of the Planning Commission.

For the purposes of CEQA, the Roesch Building is treated in this Draft EIR as an “historical resource.” The demolition of the Roesch Building would then be “deemed significant” per CEQA Section 21084.1. The proposed project would demolish two existing buildings: the Roesch Building, built in 1906, and the 1951 addition to the west. Demolition of the Roesch Building would be a significant adverse effect of the proposed project on cultural resources. Mitigation Measures that would reduce (but not eliminate) this significant impact to historic architectural resources are included in Chapter IV.

VI. ALTERNATIVES TO THE PROPOSED PROJECT

This chapter identifies alternatives to the proposed project and discusses environmental impacts associated with these alternatives. The project decision-makers could approve an alternative instead of the proposed project, if that alternative would reduce or eliminate significant impacts of the project and is determined feasible. The determination of feasibility will be made by project decision-makers on the basis of substantial evidence in the record, which shall include, but not be limited to, information presented in the Draft EIR and in comments received on the Draft EIR.

Alternatives were selected that would reduce identified impacts of the proposed project. The following alternatives were identified in the Initial Study (included as Appendix A) and are evaluated in this chapter: a No Project Alternative and an Adaptive Reuse/Preservation Alternative. As discussed in Section III.A, *Architectural Resources*, for the purposes of CEQA, The Roesch Building is an historic resource, and its demolition would constitute a significant impact.

CEQA requires the identification of the environmentally superior alternative in an EIR. For the purposes of CEQA, the Roesch Building is treated in this EIR as an “historical resource.” Therefore, the Adaptive Reuse/Preservation Alternative, Alternative B, would be the environmentally superior alternative.

A. ALTERNATIVE A: NO PROJECT

DESCRIPTION

The No Project Alternative would entail no change to the site. The proposed project — a seven-story-plus-basement building containing 194 dwelling units, including 39 affordable units, and 8,536 square feet of retail space — would not be implemented. The two existing buildings on the proposed project site — the Roesch Building and the 1951 addition — would not be demolished, and none of the existing architectural features would be altered.

IMPACTS

If the No Project Alternative were implemented, none of the impacts associated with the proposed project would occur. The existing buildings would not be demolished. The environmental characteristics of this alternative are generally described in the environmental setting section of Chapter III and the Initial Study (see Appendix A).

B. ALTERNATIVE B: ADAPTIVE REUSE/PRESERVATION OF EXISTING BUILDING

DESCRIPTION

Alternative B, Adaptive Reuse/Preservation, would be an adaptive reuse of the Roesch Building generally consistent with the *Secretary of the Interior's Standards for the Treatment of Historic Properties and Guidelines for Preserving, Rehabilitating, Restoring, and Restructuring Historic Buildings* (the *Standards*). The *Standards* are the primary document used by a broad range of government entities and private sector organizations to plan and evaluate the treatment of historic buildings. The introduction to the *Standards* states that they are “neither technical nor prescriptive, but are intended to promote responsible preservation practices. For example, they cannot, in and of themselves, be used to make essential decisions about which features of the historic building should be saved and which can be changed.” In other words, the *Standards* provide a framework and are intended as a planning and guidance tool. The City and County of San Francisco has been qualified as a Certified Local Government, which applies and implements the *Secretary's Standards*. Also, the San Francisco Landmarks Preservation Advisory Board has adopted the *Secretary's Standards* for the Board's consideration of applications to alter historic resources.

This alternative would preserve the exterior of the building, while substantially upgrading the interiors to conform with current seismic, life safety, and other building code requirements for residential use. The sheet-metal siding, with no sheathing, would not be preserved, but would be replaced with material that would match the visual qualities of the original. Changes to the Mission Street façade would restore doors and windows to their original character. This alternative would construct approximately 20 studio and one-bedroom units in the existing Roesch Building. Windows would be cut into the existing building walls to serve the new

dwelling units approximately 9,000 sf of retail and approximately 1,000 sf of community space would be located at the portion of the building that fronts on Mission Street and 15th Streets. Approximately 80 studio and one-bedroom units would be constructed in two new buildings that would be about five and six stories high and located around the Roesch Building. The new buildings would be separated by a 20-foot-wide courtyard. Underground parking of up to 90 cars (60 standard and 30 tandem) would be located in a one-story garage under the new buildings. Figure 8 is a general diagram of the Alternative B configuration. The alternative would provide a total of 100 dwelling units, compared to 194 units with the proposed project; the alternative would provide 90 parking spaces compared to about 180 individual spaces with the proposed project.

IMPACTS

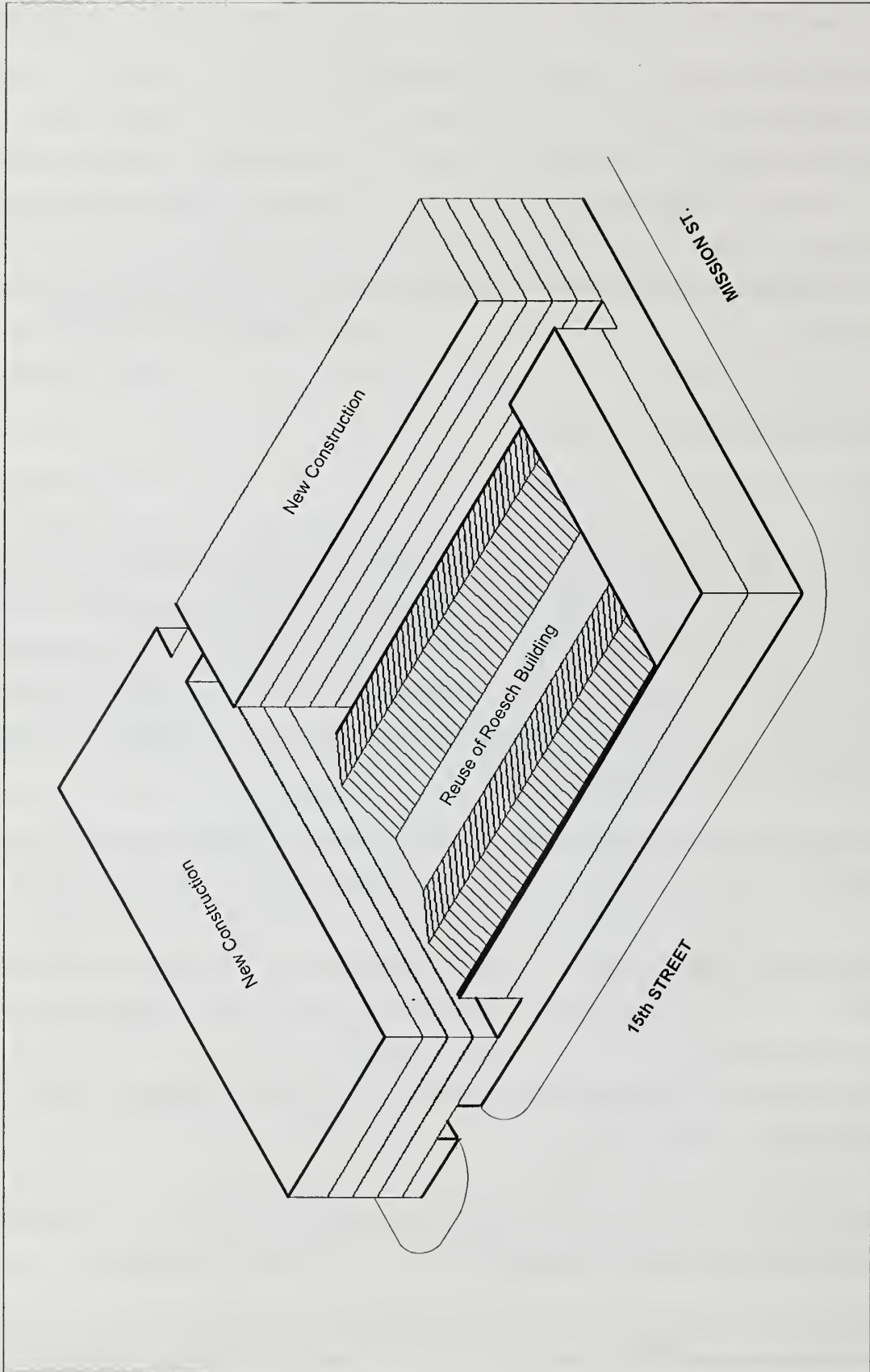
Alternative B would retain and restore important exterior architectural features and would avoid the proposed project's potentially significant impact to historic resources associated with demolition of the Roesch Building. These *Standards* are to be applied to specific rehabilitation projects in a reasonable manner, taking into consideration economic and technical feasibility. An analysis of how Alternative B would comply with the *Secretary of the Interior's Standards for Rehabilitation of Historic Structures* follows.²

- (1) *A property shall be used for its historic purpose or be placed in a new use that requires minimal change to the defining characteristics of the building and its environment,*

Alternative B would require a change in use from industrial to residential, as well as a large-scale addition. As such, the Alternative would be an adaptive reuse. Although only minor changes would be made to the principal Mission Street façade, Alternative B would involve substantial changes to the industrial interior spaces of the building. Consequently, Alternative B would not comply with this Standard.

- (2) *The historic character of a property shall be retained and preserved. The removal of historic materials and spaces that characterize a property shall be avoided.*

² McGrew/Architecture - Compliance Statement for 1880 Mission Street EIR Alternatives, June 14, 2005. This document is on file and available for public review by appointment at the Planning Department, 1660 Mission Street.



SOURCE: Forum Design Architects, May 2004.

1880 MISSION STREET

FIGURE 8: ADAPTIVE REUSE/PRESERVATION

Although this alternative would require only minor changes for the principal Mission Street façade, substantial changes to the interior industrial spaces of the building would be made. Consequently, Alternative B would not comply with this Standard.

- (3) *Each property shall be recognized as a physical record of its time, place, and use. Changes made to create a false sense of historical development, such as adding conjectural features or architectural elements from other buildings, shall not be undertaken.*

Alternative B would not include changes that would create a false sense of historical development, or add conjectural features. Therefore, Alternative B would comply with this Standard.

- (4) *Most properties change over time; those changes that have acquired historical significance in their own right shall be preserved.*

No mention is made in the Planning Department Historic Structure Evaluation Report (HRER) of changes that have acquired historical significance in their own right. Therefore, Alternative B would comply with this Standard.

- (5) *Distinctive features, finishes, and construction techniques or examples of craftsmanship that characterize a historic property shall be preserved.*

The HRER indicates that most of the building's distinctive features are found on the Mission Street façade, which would undergo minimal change. No unusual or distinctive finishes have been cited in the HRER, and the building's most distinctive construction technique (sheet-metal siding over studs, with no sheathing) may characterize this property but could not, under current building codes, be preserved. Generally, Alternative B would comply with this Standard.

- (6) *Deteriorated historic features shall be repaired rather than replaced. When the severity of deterioration requires replacement of a distinctive feature, the new feature shall match the old in design, color, texture, and other visual qualities and, where*

possible, materials. Replacement of missing features shall be substantiated by documentary, physical, or pictorial evidence.

The severity of deterioration would require replacement of the building's most distinctive feature, the sheet-metal siding. The replacement siding would match the old in material, design, color, texture, and other visual qualities. Replacement of missing windows and storefronts would be substantiated by pictorial evidence. Generally, Alternative B would comply with this Standard.

(7) *Chemical or physical treatments such as sandblasting, that cause physical damage to historic materials shall not be used. The surface cleaning of structures, if appropriate, shall be undertaken by the gentlest means possible.*

No chemical or other physical treatments such as sandblasting are proposed. Generally, Alternative B would comply with this Standard.

(8) *Significant archeological resources affected by a project shall be protected and preserved. If such resources must be disturbed, mitigation measures shall be undertaken,*

Should evidence of significant sub-surface archeological resources be found during the demolition phase of the project, the project sponsor would halt all demolition activity and notify the preservation planner assigned to the project. Archeological resources will be protected and preserved in place, as discussed on p. 45. Alternative B would comply with this Standard.

(9) *New additions, exterior alterations, or related new construction shall not destroy historic materials that characterize the property. The new work shall be differentiated from the old and shall be compatible with the massing, size, scale, and architectural features to protect the historic integrity of the property and its environment.*

With Alternative B, the proposed new additions and related new construction would not destroy historic materials that characterize the property. The new work would be differentiated from the old and would be taller with the massing, size, scale, and architectural

features of the historic integrity of the property. Generally, Alternative B would comply with this Standard.

- (10) *New additions and adjacent or related new construction shall be undertaken in such a manner that if removed in the future, the essential form and integrity of the historic property and its environment would be unimpaired.*

The proposed new additions and related new construction would be undertaken in such a manner that if removed in the future, the essential form and integrity of the historic property and its environment would be unimpaired. Generally, Alternative B would comply with this Standard.

Taking into consideration economic and technical feasibility, Alternative B would appear to comply with eight out of ten of the *Secretary's Standards*. It should be noted that as a general rule, a significant impact would be considered mitigated if the property follows the *Secretary of the Interior's Standards for the Treatment of Historic Properties with Guidelines for Preserving, Rehabilitating, Restoring, and Reconstructing Historic Buildings* or the *Secretary of Interior's Standards for Rehabilitation and Guidelines for Rehabilitating Historic Buildings*. As Alternative B would comply with eight out of ten *Secretary's Standards* (which are issued as guidelines, not mandates) the alternative would avoid a significant adverse effect on an historical resource.

ALTERNATIVES CONSIDERED AND REJECTED

As discussed above, Alternative B, Adaptive Reuse/Preservation, would be generally consistent with the *Secretary's Standards* and would avoid a significant adverse effect of demolition of the Roesch Building, an historical resource. Alternative B would not, as also noted above, meet two of the *Standards*:

- (1) *A property shall be used for its historic purpose or be placed in a new use that requires minimal change to the defining characteristics of the building and its environment.*
- (2) *The historic character of a property shall be retained and preserved. The removal of historic materials and spaces that characterize a property shall be avoided.*

Alternative B would convert the building for residential uses, and would remove substantial portions of the interior. A Preservation Alternative that would meet those standards strictly would continue the industrial/printing plant activities in the Roesch Building, and would retain the heavy-timber interior structural features. It is likely that long-term use of building in this way would still involve substantial life-safety, structural, and seismic code upgrades that would be expected to alter or compromise the historic interior features. Thus, meeting the *Standards* strictly would likely require substantial interior changes. In addition, retention of industrial use of the building would not meet the project sponsor's objectives of developing a residential and commercial project at the site. Therefore, because Alternative B, Adaptive Reuse/Preservation, would avoid a significant adverse effect, and because a Preservation Alternative that would meet the *Standards* strictly would not meet major objectives of the proposed project, such an alternative was not considered further.

VII. DRAFT EIR DISTRIBUTION LIST

Copies of this Draft EIR or Notices of Availability and Draft EIR hearing were mailed or delivered to the following public agencies, organization, and individuals. In addition, Notices of Availability were sent to tenants at the project site, adjacent property owners and tenants, and other interested parties.

FEDERAL AND STATE AGENCIES

State Office of Intergovernmental Management
State Clearinghouse
1400 Tenth Street, Room 121
P.O. Box 3044
Sacramento, CA 95812-3044

Leigh Jordan, Coordinator
Northwest Information Center
Sonoma State University
1303 Maurice Avenue
Rohnert Park, CA 94928

Nandini N. Shridhar
California Department of Transportation
Office of Transportation Planning - B
P.O. Box 23660
Oakland, CA 94623-0660

California Department of Fish and Game
Central Coast Region
Habitat Conservation
P.O. Box 47
Yountville, CA 94599

U.S. Fish and Wildlife Service
2800 Cottage Way, Room W-2605
Sacramento, CA 95825-1846

Lucinda Woodward
Local Gov and Info Management Unit
State Office of Historic Preservation
PO Box 942896
Sacramento CA 94296-0001

REGIONAL AGENCIES

Suzan Ryder
Association of Bay Area Governments
P.O. Box 2050
Oakland, CA 94604-2050

Jean Pedersen
Association of Bay Area Governments
101 8th Street
Oakland, CA 94607

Craig Goldblatt
Metropolitan Transportation Commission
101 8th Street
Oakland, CA 94607

Joseph Steinberger
Bay Area Air Quality Management District
939 Ellis Street
San Francisco, CA 94109

Mr. Alan Zahradnik
Director of Planning and Policy Analysis
Golden Gate Bridge,
Highway and Transportation District
1011 Andersen Drive
San Rafael, CA 94901

Judy Huang
Regional Water Quality Control Board
San Francisco Bay Region
1515 Clay St., Suite 1400
Oakland, CA 94612

Dennis Baker
Chief of Operations
City of Daly City
Wastewater Treatment Plant
153 Lake Merced Blvd.
Daly City, CA 94015

PLANNING COMMISSION

Sue Lee, President
Dwight S. Alexander, Vice-President
Michael J. Antonini
Shelley Bradford Bell
Kevin Hughes
William L. Lee
Christina Olague
Linda Avery, Commission Secretary

LANDMARKS PRESERVATION ADVISORY BOARD

M. Bridget Maley, President
Elizabeth Skronidal, Vice President
Lily Chan
Robert Cherny
Ina Dearman
Jeremy Kotas
Alan Martinez
Suheil Shatara
Johanna Street
Andrea Green, Recording Secretary

CITY AND COUNTY OF SAN FRANCISCO

John Deakin
Director
Bureau of Energy Conservation
Hetch Hetchy Water & Power
1155 Market Street, 4th Floor
San Francisco, CA 94103

Frank Chiu
Superintendent
Department of Building Inspection
1660 Mission Street
San Francisco, CA 94103

Pamela David
 Mayor's Office of Community Development
 25 Van Ness Ave Suite 700
 San Francisco, CA 94102

Anthony Delucchi
 Director of Property
 San Francisco Real Estate Department
 25 Van Ness, 4th Floor
 San Francisco, CA 94102

Peter Straus
 Service Planning Department
 San Francisco MUNI
 1145 Market St., Suite 402
 San Francisco, CA 94103

Jeff White
 Housing Division
 San Francisco Redevelopment Agency
 770 Golden Gate Ave.
 San Francisco, CA 94102

Director
 Mayor's Office of Housing
 25 Van Ness Ave # 600
 San Francisco CA 94102

Paul D. Jones, Asst. Deputy Chief
 San Francisco Fire Department
 Division of Support Services
 698 Second Street, Room 305
 San Francisco CA 94107-2015

Supervisor Tom Ammiano
 City Hall
 1 Dr. Carlton B. Goodlett Place, Room #244
 San Francisco, CA 94102-4689

Supervisor Chris Daly
 City Hall
 1 Dr. Carlton B. Goodlett Place, Room 244
 San Francisco, CA 94102-4689

Barbara Moy
 San Francisco Dept of Public Works
 Bureau of Street Use and Mapping
 875 Stevenson Street Room 465
 San Francisco, CA 94103

Susan Leal
 General Manager
 Public Utilities Commission
 1155 Market Street
 San Francisco, CA 94102

Bond M. Yee
 San Francisco Dept of Parking & Traffic
 Traffic Engineering Division
 25 Van Ness Avenue
 San Francisco, CA 94102

Recreation & Park Department
 McLaren Lodge, Golden Gate Park
 Fell and Stanyan Streets
 San Francisco, CA 94117

Mario S. Ballard, Captain
 Bureau of Fire Prevention & Investigation
 1660 Mission Street, 2nd Floor
 San Francisco, CA 94103

Capt. Timothy Hettrich
 Police Department
 Planning Division of Hall of Justice
 850 Bryant Street, Room 500
 San Francisco, CA 94103

Department of Building Inspection
 Attn Laurence Komfield
 Inter-office #19
 1660 Mission Street
 San Francisco CA 94103

GROUPS AND INDIVIDUALS

Ethel Siegel Newlin
Community Liaison
16th & Mission Public Safety
c/o SJETC 3040 16th Street
San Francisco, CA 94103

St. John the Evangelist
Julian Neighbors
1661 15th Street
San Francisco, CA 94103

Caroline Rabinowitz
Development Director
Capp Street Project
450 Irwin Street
San Francisco, CA 94107

Eileen Gold
19th Street/Oakwood Neighborhood
3631 - 19th St.
San Francisco, CA 94110

John Barbey
Chairperson
Liberty Hill Residents Assn.
50 Liberty Street
San Francisco, CA 94110

Debra Walker
Developing Environments Inc.
540 Alabama Street
San Francisco, CA 94110

Amy Powell
President
Dolores Heights Improvement Club
3732 21st Street
San Francisco, CA 94114-2915

Paul Nixon
Fair Oaks Neighbors
163 Fair Oaks Street
San Francisco, CA 94110

Don Miller
President
Cal Watch
3101 20th Street
San Francisco, CA 94110

Doug Shoemaker
Mission Housing Develop. Corp.
16th Street\North Mission Assoc.
474 Valencia Street
San Francisco, CA 94103

Christine Dias
Lexington Lookout
353 Lexington Ave.
San Francisco, CA 94110

Buddy Choy
President
Coleridge St. Neighbors
157 Coleridge St.
San Francisco, CA 94110

Jorje Hernandez
24th Street Merchants Association
2914 24th Street
San Francisco, CA 94110

Jean Martin
300 Block Shotwell St. Neigh. Assn
337 Shotwell Street
San Francisco, CA 94110

Michael Nulty
Alliance for a Better District 6
PO Box 420782
San Francisco, CA 94142-0782

Ian Lewis
HERE Local 2
209 Golden Gate Avenue
San Francisco, CA 94102

Curtis Eisenberger
Coordinator
Mission Coalition for Econ. Justice &
555 Florida Street Ste. 100
San Francisco, CA 94110

Pete Gallegos
Mission Economic & Cultural Assn.
2899 – 24th St.
San Francisco, CA 94110

President
So. Of Army Mission Merch. Assn.
3208 Mission St.
San Francisco, CA 94110

Dick Millet
President
Potrero Boosters Neighborhood Assn.
1459 – 18th Street, Suite 133
San Francisco, CA 94107

Ricardo Alva
Deputy Director
Mission Language & Voc. Sch. Inc.
2929 – 19th Street
San Francisco, CA 94110

Rachael Raker
President
Treat Street Neighbors
830 Treat Avenue
San Francisco, CA 94110

Jim Meko
Chair
SOMA Leadership Council
366 Tenth Street
San Francisco, CA 94103

Philip Lesser
President
Mission Merchants Association
PO Box 40280
San Francisco, CA 94140

Marilyn Bair
Treasurer
Inner Mission Neighbors
705 Capp Street
San Francisco, CA 94110

Antonio Diaz
Project Director
PODER
474 Valencia Street #155
San Francisco, CA 94103

Don Marcos
Executive Director
Mission Hiring Hall
3042 16th Street
San Francisco, CA 94103-3419

Delma Rose Chuchwar
South Mission Neighbhd Impr. Assn.
3330 – 23rd St.
San Francisco, CA 94110

S.O. Kish
S.F. Mission Lions Club
3159 Mission St.
San Francisco, CA 94110

Aaron Straus
Mission Merchants
PO Box Drawer GG
Daly City, CA 94017-0234

Bernardo Gonzales
President
Twenty-Fourth St. Merch. Assn.
2720 – 24th St.
San Francisco, CA 94110

Rick Hauptman
San Francisco Community Calendar
4104-24th Street
San Francisco, CA 94114

Tom Mogensen
 President
 Upper Noe Neighbors
 1459 Church Street
 San Francisco, CA 94131

Gillian Gillett
 Co-Chair
 San Jose/Guerrero Coalition Save R
 4104 24th Street #130
 San Francisco, CA 94114

Ann Patterson
 Natoma & Vicinity Neighbors
 1383 Natoma Street
 San Francisco, CA 94103

Howard Thornton
 President
 2573 Harrison Street
 San Francisco, CA 94110

Andrew L. Solow
 Vice President
 So. Van Ness Corridor Assn.(SVNCA)
 58 Lake Forest Ct
 San Francisco, CA 94131-1025

F Joseph Butler Architect
 1048 Union St #19
 San Francisco CA 94133

The Art Deco Society of California
 100 Bush Street Suite 511
 San Francisco CA 94104

Gerald D Adams
 152 Lombard St #404
 San Francisco CA 94111 -1134

Nancy Shanahan
 Telegraph Hill Dwellers
 224 Filbert Street
 San Francisco CA 94133

Frank Morales
 Mission Playground
 3554 19th Street
 San Francisco, CA 94110

Peter Cohen
 Community Planner
 Urban Solutions
 1083 Mission Street, 2nd Floor
 San Francisco, CA 94103

Toby Levine
 Co-Chairman
 San Jose/Guerrero Coalition Save R
 4104 24th Street #130
 San Francisco, CA 94114-3615

Gwen Kaplan
 President
 Northeast Mission Business Assn.
 2757 16th Street
 San Francisco, CA 94103

California Heritage Council
 PO BOX 475046
 San Francisco CA 94147

Western Neighborhoods Project
 PO 460936
 San Francisco CA 94146-0936

Carey & Co Inc
 460 Bush Street
 San Francisco CA 94108

Dorice Murphy
 Eureka Valley Trails & Art Network
 175 Yukon Street
 San Francisco CA 94114

Gerald D Adams
 San Francisco Chronicle
 901 Mission St
 San Francisco CA 94103

Shirley Albright
Landmarks Council of California
306 Arguello Blvd Apt 101
San Francisco CA 94118

David P. Cincotta
Law Offices of David P. Cincotta
1388 Sutter St Ste 915
San Francisco CA 94109

Frank Fudem
BT Commercial
201 California Street
San Francisco, CA 94111

Marie Zeller
Patri Merker Architects
400 Second Street Ste 400
San Francisco CA 94107

Joseph B. Pecora
882 Grove Street
San Francisco CA 94117

Jenny Warner
1455 Market Street, 10th Floor
San Francisco, CA 94103

Bay Area Council
200 Pine Street Suite 300
San Francisco, CA 94104-2702

Chi-Hsin Shao
CHS Consulting Group
500 Sutter Street, Suite 216
San Francisco, CA 94102

Alice Suet Barkley
Office Counsel
Luce Forward Attorneys at Law
121 Spear St Ste 200
San Francisco, CA 94105

Environmental Science Associates Inc
225 Bush Street, Suite 1700
San Francisco CA 94104-4207

Linda Mjellem
Union Square Assoc
323 Geary St Ste 408
San Francisco CA 94102

Elizabeth Skronal
1990 Green Street, #307
San Francisco CA 94123

Fort Point and Presidio Historical
Association
PO Box 29163
San Francisco CA 94129

Courtney S. Clarkson
Pacific Heights Residents Assn.
3109 Sacramento Street
San Francisco CA 94115

Institute of Government Studies
109 Moses Hall
University of California
Berkeley, CA 94720

John J. Walsh
1390 Market Street
San Francisco, CA 94102

Mary Murphy
Farella Braun & Martel
235 Montgomery Street
San Francisco, CA 94104

John Bardis
Sunset Action Committee
1501 Lincoln Way #503
San Francisco, CA 94122

James W. Haas, Chairman
Civic Pride!
555 Montgomery Street, Suite 850
San Francisco, CA 94110

Georgia Brittan
San Franciscans for Reasonable Growth
460 Duncan Street
San Francisco, CA 94131

Carolyn Dee
Downtown Association
5 Third Street, Suite 520
San Francisco, CA 94103

Jay Cahill
Cahill Contractors, Inc.
425 California Street, Suite 2300
San Francisco, CA 94104

David Cincotta
1388 Sutter Street, Suite 915
San Francisco, CA 94102

John Vaughan
Cushman & Wakefield of California, Inc.
1 Maritime Plaza, Suite 900
San Francisco, CA 94111

Steven L. Vettel
Morrison & Foerster, LLP
Attorneys at Law
425 Market Street
San Francisco, CA 94105-2482

Gerry Katz
Greenwood Press, Inc.
P.O. Box 5007
Westport, Conn 06881-5007

Jan Vargo
Kaplan/McLaughlin/Diaz
222 Vallejo Street
San Francisco, CA 94111

Larry Mansbach
Mansbach Associates
582 Market Street, Suite 217
San Francisco, CA 94104

Page & Turnbull
724 Pine Street
San Francisco, CA 94109

Carol Lester
Chicago Title
388 Market Street, 13th Floor
San Francisco, CA 94111

Coalition for San Francisco Neighborhoods
P.O. Box 320098
San Francisco, CA 94132 – 0098

Gensler and Associates
600 California Street
San Francisco, CA 94103

Gruen, Gruen & Associates
564 Howard Street
San Francisco, CA 94105

Sally Maxwell
Maxwell & Associates
1522 Grand View Drive
Berkeley, CA 94705

Marie Zeller
Patri Merker Architects
400 Second Street, Suite 400
San Francisco, CA 94107

Dennis Purcell
Coblentz, Patch, Duffy and Bass
222 Kearny Street, 7th Floor
San Francisco, CA 94108

Bob Rhine
Capital Planning Department
UCSF
145 Irving Street
San Francisco, CA 94122

Dee Dee Workman
Executive Director
San Francisco Beautiful
41 Sutter Street, #709
San Francisco, CA 94104

Environmental and Land Use Section
Pillsbury, Winthrop LLP
50 Fremont Street
San Francisco, CA 94105

James Reuben
Reuben and Junius, LLP
235 Pine Street, 16th Floor
San Francisco, CA 94104

Thomas N. Foster
Rothschild & Associates
300 Montgomery Street
San Francisco, CA 94104

San Francisco Chamber of Commerce
235 Montgomery 12th Floor
San Francisco, CA 94104

James Chappell
President
San Francisco Planning & Urban Research
Association
312 Sutter Street
San Francisco, CA 94108

San Francisco Group
Sierra Club
85 2nd Street, Floor 2
San Francisco, CA 94105-3441

John Kriken
Skidmore, Owings & Merrill, LLP
One Front Street, Suite 2400
San Francisco, CA 94111

Robert S. Tandler
3490 California Street
San Francisco, CA 94118-1837

Jerry Tone
Montgomery Capital Corp.
244 California Street
San Francisco, CA 94111

Mary Anne Miller
San Francisco Tomorrow
1239 42nd Avenue
San Francisco, CA 94122

Tony Kilroy
San Francisco Tomorrow
41 Sutter Street #1579
San Francisco, CA 94104

Sedway Group
505 Montgomery Street, #600
San Francisco, CA 94111-2552

Jim Ross
Solem & Associates
550 Kearny Street
San Francisco, CA 94108

Sustainable San Francisco
P.O. Box 460236
San Francisco, CA 94146

Joel Ventresca
1278 – 44th Avenue
San Francisco, CA 94122

Calvin Welch
Council of Community Housing Organizations
409 Clayton Street
San Francisco, CA 94117

David C. Levy Esq
Morrison & Foerster LLP
425 Market St
San Francisco, CA 94105-2482

Diane Wong
UCSF Campus Planning
3333 California Street, Suite 11
San Francisco, CA 94143-0286

Stephen Weicker
899 Pine Street #1610
San Francisco, CA 94108

Bethea Wilson & Associates Art In Architecture
2028 Scott, Suite 204
San Francisco, CA 94115

Andrew Tuft
Singer Associates
140 Second Street, 2nd Floor
San Francisco, CA 94105

Peter Bosselman
Environmental Simulation Laboratory
119 Wurster Hall
University of California
Berkeley, CA 94720

DKS Associates
1956 Webster Street, #300
Oakland, CA 94612

Robert Meyers Associates
120 Montgomery Street, Suite 2290
San Francisco, CA 94104

Bob Jacobvitz
AIA
San Francisco Chapter
130 Sutter Street
San Francisco CA 94104

Richard Mayer
NRG Energy Center
410 Jessie Street, Suite 702
San Francisco CA 94103

Bruce White
3207 Shelter Cove Avenue
Davis, CA 95616

Doug Longyear, Tony Blaczek
Coldwell Banker
Finance Department
1699 Van Ness Avenue
San Francisco, CA 94109

Philip Fukuda
TRI Commercial
1 California Street, Suite 1200
San Francisco, CA 94111

Dale Carleson
Pacific Exchange
301 Pine Street
San Francisco, CA 94104

Howard M. Wexler, Esq.
Farella, Braun & Martel, LLP
235 Montgomery Street, 30th Floor
San Francisco, CA 94104

John Elberling
Tenants and Owners Development Corp.
230 – Fourth Street
San Francisco, CA 94103

James C. DeVoy
Milton Meyer & Co.
One California Street
San Francisco, CA 94111

Richard A. Judd
Goldfarb & Lipman
1300 Clay Street, 9th Floor
City Center Plaza
Oakland, CA 94612-1455

The Jefferson Company
10 Lombard Street, 3rd Floor
San Francisco, CA 94111-1165

Legal Assistance to the Elderly
Howard Levy, Director
100 McAllister Street, #412
San Francisco, CA 94102

Michael Dyett
Dyett & Bhatia
755 Sansome St. #400
San Francisco, CA 94111

Dale Hess, Executive Director
San Francisco Convention & Visitors Bureau
201 – 3rd Street, Suite 900
San Francisco, CA 94103

Chinatown Resource Center
1525 Grant Avenue
San Francisco, CA 94133

John Elberling
Yerba Buena Consortium
182 Howard Street, #519
San Francisco, CA 94105

Charles Chase
Executive Director
San Francisco Architectural Heritage
2007 Franklin Street
San Francisco, CA 94109

Dave Kremer
Shartsis Freise & Ginsburg
One Maritime Plaza, 18th Floor
San Francisco, CA 94111

Hartmut Gerdes
Square One Productions
1736 Stockton Street, Studio 7
San Francisco, CA 94133

Barbara W. Sahm
Turnstone Consulting
330 Townsend St., Suite 216
San Francisco, CA 94107

Jon Twichell Associates
70 Hermosa Avenue
Oakland, CA 94618

Dan Cohen
EDAW
150 Chestnut Street
San Francisco, CA 94111

Cliff Miller
89 Walnut Avenue
Corte Madera, CA 94925-1028

Regina Sneed
National Lawyers Guild
558 Capp Street
San Francisco, CA 94110

Peter Bass
Ramsay/Bass Interest
3756 Grant Avenue, Suite 301
Oakland, CA 94610

David P. Rhoades & Associates
364 Bush Street
San Francisco, CA 94104-2805

Stanley Smith
San Francisco Building & Construction
Trades Council
150 Executive Park Blvd Ste 4700
San Francisco, CA 94134-3341

Walter Johnson
San Francisco Labor Council
1188 Franklin Street, #203
San Francisco, CA 94109

John Sanger, Esq.
1 Embarcadero Center, 12th Floor
San Francisco, CA 94111

Eunice Willette
1323 Gilman Avenue
San Francisco, CA 94124

Paul Kollerer/Tom Balestri
Cahill Construction Services
1599 Cluster Avenue
San Francisco, CA 94124-1414

Sue Hestor
Attorney at Law
870 Market Street, Room 1128
San Francisco, CA 94102

MEDIA

Bill Shiffman
Associated Press
303 2nd Street, #680 North
San Francisco, CA 94107-1366

City Hall Bureau
San Francisco Chronicle
901 Mission Street
San Francisco, CA 94103

City Desk
San Francisco Independent
1201 Evans Avenue
San Francisco, CA 94124

San Francisco Business Times
275 Battery Street, Suite 940
San Francisco, CA 94111

City Editor
San Francisco Bay Guardian
135 Mississippi Street
San Francisco, CA 94701

Leland S. Meyerzone
KPOO – FM
P.O. Box 6149
San Francisco, CA 94101

The Sun Reporter
1791 Bancroft Avenue
San Francisco, CA 94124-2644

San Francisco Examiner
450 Mission Street
San Francisco, CA 94105

LIBRARIES

Government Information Services
San Francisco Main Library Civic Center
San Francisco, CA 94102

Hastings College of the Law Library
200 McAllister Street
San Francisco, CA 94102-4978

Government Publications Department
San Francisco State University Library
1630 Holloway Avenue
San Francisco, CA 94132

Stanford University Libraries
Jonsson Library of Government Documents
State & Local Documents Division
Stanford, CA 94305

Institute of Government Studies
109 Moses Hall
University of California
Berkeley, CA 94720

NEARBY PROPERTY OWNERS

Approximately 50 property owners and occupants in the project vicinity were sent Notices of Availability of the Draft EIR. A complete list of names and addresses is available by appointment.

VIII. REPORT PREPARERS AND PERSONS CONSULTED

LEAD AGENCY

Planning Department, City and County of San Francisco
1660 Mission Street, Suite 500
San Francisco, CA 94103

Environmental Review Officer: Paul Maltzer

EIR CONSULTANTS

EIP Associates
353 Sacramento Street, Suite 1000
San Francisco, CA 94111

Project Director: Michael Rice, AICP

Participants: Steve Smith
Anne Martin
Jackie Ha
Kevin Tran

PROJECT SPONSOR

Armax International, Inc.
135 Stillman Street
San Francisco, CA 94107

Agustin Maxemin

PROJECT ATTORNEYS

Gladstone and Associates
177 Post Street
San Francisco, CA 94108

Brett Gladstone
Ilene Dick

PROJECT ARCHITECT

Forum Design
1014 Howard Street
San Francisco, CA 94103

Warner Schmalz, AIA

APPENDIX A: INITIAL STUDY

NOTICE OF PREPARATION OF ENVIRONMENTAL IMPACT REPORT

Date of this Notice:	April 23, 2005	
Lead Agency:	City and County of San Francisco, Planning Department 1660 Mission Street, 5th Floor, San Francisco, CA 94103	
Agency Contact Person:	Paul E. Maltzer	Telephone: (415) 558-5977
Project Title:	2000.1164E 1880 Mission Street Mixed-Use Development	
Project Sponsor:	Armax International	
Project Contact Person:	Warner Schmalz, Forum Design	Telephone: (415) 252-7063
Project Address:	1880 Mission Street.	
Assessor's Block and Lot:	Block 3547, Lots 2A, 3, 4, and 29	
City and County:	San Francisco	

Project Description: The project site on Assessor's Block 3547, on Lots 2A, 3, 4, and 29 is approximately 51,888 sf in size and contains two existing buildings containing warehouse use and printing plant with offices. The project site is located at 1880-1886 Mission Street at 15th Street (northwest corner) bordered by 14th Street to the north, Mission Street to the east, 15th Street to the south and Julian Street to the west (see Figure 1), within the Mission District neighborhood, in Assessor's Block 3547, Lots 2A, 3, 4, and 29. The project site is located in a Heavy Commercial (C-M) zoning district, within a 65-B/50-X Height and Bulk district, as well as the Mission District Interim Controls district.

The proposal is to demolish the two existing buildings and construct one six-story plus two-level basement building containing 194 dwelling units, including 39 affordable units, and 8,536 square feet (sf) of retail space. The ground floor would contain the retail space, residential lobby, rental office, community room, fitness center and mechanical/utility uses. The second through sixth floors would contain 194 residential units (138 one-bedroom units, 49 two-bedroom units, and 17 three-bedroom units). The basement and ground floor levels would contain 181 parking spaces with ingress and egress from 15th Street. 110 spaces would be independently accessible spaces, and 71 spaces would be on individual lifts. An additional 40 spaces would be provided with tandem/managed parking program available during business hours, approximately 6 a.m. to 11 p.m.

The project would include about 1,940 sf of common open space on the ground level, and the podium would have 9,885 sf of common space. Thirty-four units would have a total of 1,224 sf of private open space. The project would provide two off-street loading spaces. The project would include 193,588 sf of residential and common areas, and 8,536 sf of retail area, for a total gross floor area of 202,124 sf. Parking and residential space, not counted as gross floor area, would be 34,990 sf.

THIS PROJECT MAY HAVE A SIGNIFICANT EFFECT ON THE ENVIRONMENT AND AN ENVIRONMENTAL IMPACT REPORT IS REQUIRED. This finding is based upon the criteria of the Guidelines of the State of Secretary for Responses, Sections 15063 (Initial Study), 15064 (Determining Significant Effect), and 15065 (Mandatory Findings of Significance), and the reasons as documented in the Environmental Evaluation (Initial Study) for the project, which is attached.

Written comments on the scope of the EIR will be accepted until the close of business on May 23, 2005. Written comments should be sent to Paul Maltzer, San Francisco Planning Department, 1660 Mission Street, Ste., 500, San Francisco, CA 94103.

State Agencies: We need to know the views of your agency as to the scope and content of the environmental information that is germane to your agency's statutory responsibilities in connection with the proposed project. Your agency may need to use the EIR when considering a permit or other approval for this project. Please include the name of a contact person in your agency. Thank you.

April 23, 2005
Date


Paul E. Maltzer, Environmental Review Officer

INITIAL STUDY

2000.1164E: 1880 MISSION STREET

I. PROJECT DESCRIPTION

The proposal is to demolish the two existing buildings and construct one six-story plus two-level basement building containing 194 dwelling units, including 39 affordable units, and 8,536 square feet (sf) of retail space. The ground floor would contain the retail space, residential lobby, rental office, community room, fitness center and mechanical/utility uses. The second through sixth floors would contain 194 residential units (138 one-bedroom units, 49 two-bedroom units, and 17 three-bedroom units). The basement and ground floor levels would contain 181 parking spaces with ingress and egress from 15th Street. 110 spaces would be independently accessible spaces, and 71 spaces would be on individual lifts. An additional 40 spaces would be provided with tandem/managed parking program available during business hours, approximately 6 a.m. to 11 p.m.

The project would include about 1,940 sf of common open space on the ground level, and the podium would have 9,885 sf of common space. Thirty-four units would have a total of 1,224 sf of private open space. The project would provide two off-street loading spaces. The project would include 193,588 sf of residential and common areas; and 8,536 sf of retail area, for a total gross floor area of 202,124 sf. Parking and residential space, not counted as gross floor area, would be 34,990 sf.

The project site on Assessor's Block 3547, on Lots 2A, 3, 4, and 29 is approximately 51,888 sf in size and contains two existing buildings containing warehouse use and printing plant with offices. The project site is located at 1880-1886 Mission Street at 15th Street (northwest corner) bordered by 14th Street to the north, Mission Street to the east, 15th Street to the south and Julian Street to the west (see Figure 1), within the Mission District neighborhood, in Assessor's Block 1092, on Lots 1, 2, 3, 4, 5, 6, and 36. The project site is located in a Heavy Commercial (C-M) zoning district, within a 65-B/50-X Height and Bulk district, as well as the Mission District Interim Controls district.

Existing development in the project vicinity is primarily devoted to commercial and residential uses, with some medium-sized office buildings located two to three blocks away to the north of the Central Freeway. In the immediate site vicinity are neighborhood commercial/retail uses, light industrial uses, and multi-family residential buildings.

The project block is developed with buildings ranging from 14 feet to 50 feet in height. The block immediately south of the project block is developed with buildings ranging from 10 to 52 feet in height.

Along Mission Street, the building adjacent to the vacant site to the north is a community service building and the currently vacant State Armory and Arsenal Building, a four-story lot-line-to-lot-line brick structure. The building across Mission Street to the east is a three-story commercial building, immediately across 15th Street to the south is a two-story automotive repair building and three-story residential buildings. The large blocks are bisected by narrow streets lined primarily with two- to four-story multi-family dwellings and commercial uses. Two- to four-story residences, many with ground floor retail, also line much of the major thoroughfares of Mission and Valencia Streets. Vincentian Villa, an elderly residential facility, is across Mission Street and north of the project site. Valencia Gardens, a former public housing site, is one block to the west and is under construction as a HOPE VI affordable residential and commercial development, with 290 units. Retail and commercial uses in the vicinity include automotive repair and sales, storage spaces, liquor and grocery stores, a glass works, a sausage factory, and restaurants. Small parking lots for private parking and used/new car sales are also a common use.

Julian Street between 14th – 15th Streets is commercial in land use character, with two- to three-story buildings, a parking lot, and a residential building on the northwest corner of Julian and 14th Street. Julian Street between 15th – 16th Streets is predominately low-density residential in character mid-block with a large church building and a bank on either end of the western side of the street as anchors. Across Julian Street from the project site is the Native American Friendship House, a residential drug and alcohol treatment center.

II. APPROVALS REQUIRED

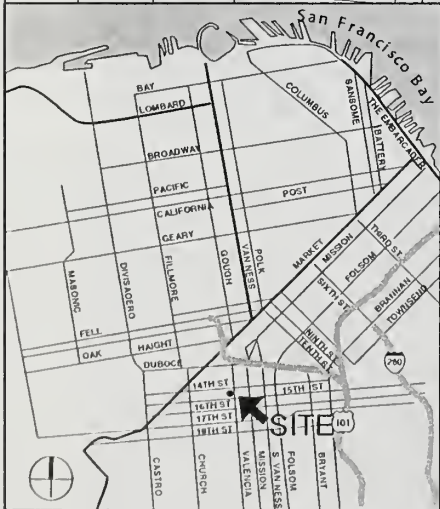
The project site is located in a Heavy Commercial zoning district (C-M), and within a 65-B/50-X Height and Bulk district. Conditional Use authorization would be required for a Planned Unit Development, for dwelling units in a C-M zoning district, for a bulk exception, for development on a site larger than 40,000 sq ft, and because the project proposes to provide less than 25 percent of its housing units as affordable housing. The Department of Building Inspection would require building permits for the proposed demolition of two existing buildings and construction one new building.

A. EFFECTS FOUND TO BE POTENTIALLY SIGNIFICANT

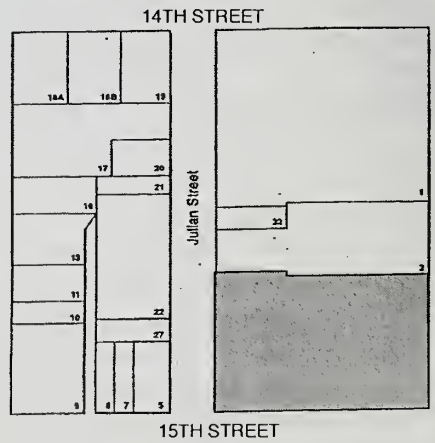
This Initial Study examines the project to identify potential effects on the environment. On the basis of this study, project-specific effects that have been determined to be potentially significant relate to historic resources. That issue will be analyzed in an Environmental Impact Report (EIR). Topics noted “TO BE DETERMINED” mean that discussion in the EIR will enable a determination of whether or not there would be a significant impact.

B. EFFECTS FOUND NOT TO BE SIGNIFICANT

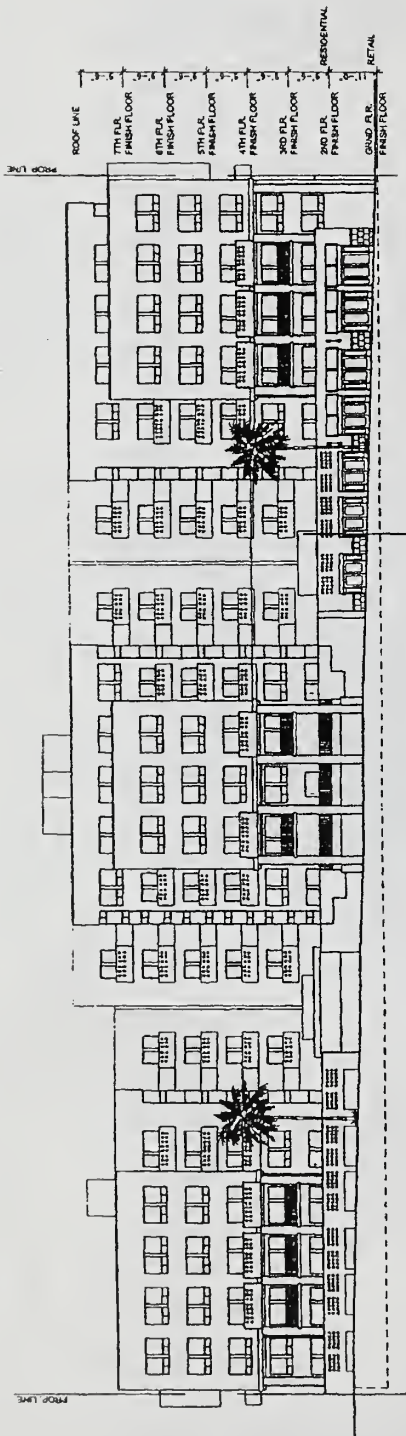
The following items on the Initial Study Checklist have been checked “No,” indicating that, upon evaluation, staff has determined that the proposed project could not have a significant adverse effect or that effect would be mitigated to insignificance through measures included in the project: land use, population and housing, visual quality, transportation, air quality, shadows, wind, noise, utilities and public services, biology geology and topography, water, energy and natural resources, hazards, and archaeological resources. Several of these Checklist items have also been checked “Discussed,” indicating that the Initial Study text includes discussion about that particular issue. For all the items checked “No,” without discussion, the conclusions regarding potential significant environmental effects are based on field observation, staff experience and expertise on similar projects, and/or standard reference material available within the Department, such as the Department’s Transportation Guidelines for Environmental review, or the California Natural Diversity Data Base and maps, published by the California Department of Fish and Game. For each checklist item, the evaluation has considered the impacts of the project both individually and cumulatively.



- Legend**
- 3547 BLOCK NUMBER
 - 2A,3,4, and 29 LOT NUMBERS
 - PROJECT LOCATION



1880 MISSION STREET
FIGURE 1: PROJECT LOCATION



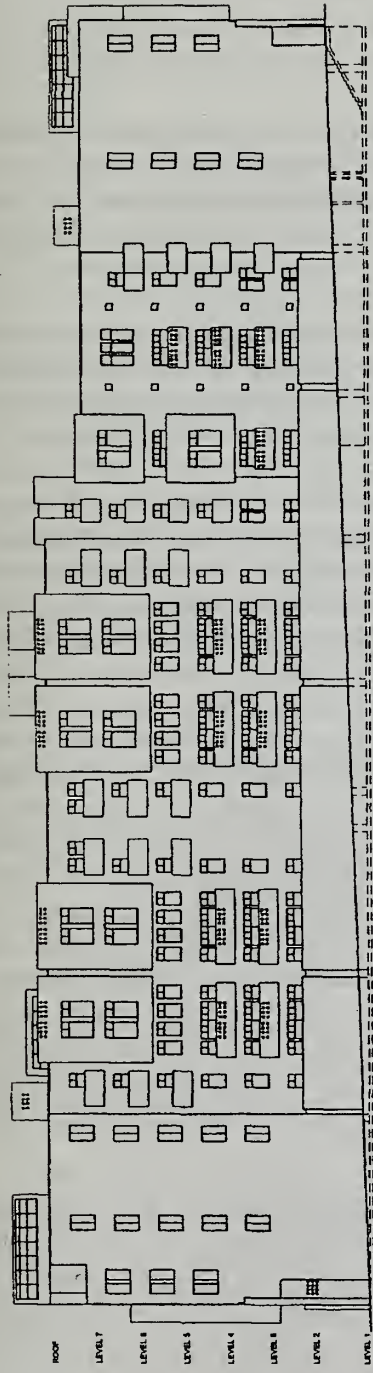
15 TH STREET ELEVATION



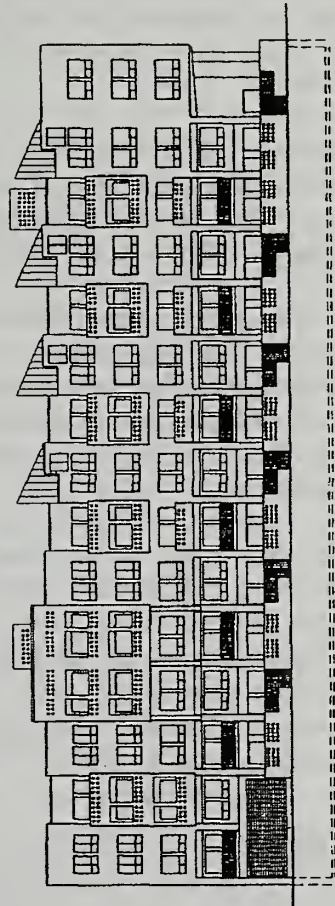
MISSION STREET ELEVATION

1880 MISSION STREET

FIGURE 3: 15TH STREET AND MISSION STREET ELEVATIONS



INTERIOR LOT LINE ELEVATION



JULIAN STREET ELEVATION

1880 MISSION STREET
 FIGURE 4: INTERIOR LOT LINE AND JULIAN STREET ELEVATIONS

III. ENVIRONMENTAL EVALUATION CHECKLIST AND DISCUSSION

A. COMPATIBILITY WITH EXISTING ZONING AND PLANS	<u>Discussed</u>	<u>Not Applicable</u>
1) Discuss any variances, special authorizations, or changes proposed to the Planning Code or Zoning Map, if applicable.	<u>X</u>	<u> </u>
2) Discuss any conflicts with any adopted environmental plans and goals of the City or Region, if applicable.	<u>X</u>	<u>X</u>

The San Francisco Planning Code implements the General Plan, and governs permitted uses, densities, and configuration of buildings within San Francisco. The Code incorporates by reference the City Zoning Maps. Permits to construct new buildings or to alter or demolish existing ones may not be issued unless the proposed project conforms to the Code, or an exception is granted pursuant to provisions of the Code.

Environmental plans and policies, such as the '97 Clean Air Plan, directly address physical environmental issues and/or contain standards or targets that must be met in order to preserve or improve specific components of the City's physical environment. The proposed project would not obviously or substantially conflict with any such adopted environmental plan or policy.

The San Francisco General Plan, which provides general policies and objectives to guide land use decisions, contains some policies that relate to physical environmental issues. The compatibility of the project with General Plan policies that do not relate to physical environmental issues will be considered by decision-makers as part of their decision whether to approve or disapprove the proposed project and any potential conflicts identified as part of that process would not alter the physical environmental effects of the proposed project.

On November 4, 1986, the voters of San Francisco passed Proposition M, the Accountable Planning Initiative, which established eight Priority Policies. These policies are: preservation and enhancement of neighborhood-serving retail uses; protection of neighborhood character; preservation and enhancement of affordable housing; discouragement of commuter automobiles; protection of industrial and service land uses from commercial office development and enhancement of resident employment and business ownership; earthquake preparedness; landmark and historic building preservation; and protection of open space. Prior to issuing a permit for any project which requires an Initial Study under the California Environmental Quality Act (CEQA), or adopting any zoning ordinance or development agreement, the City is required to find that the proposed project or legislation is consistent with the Priority Policies. The case report that will be prepared for the proposed project's requests for a conditional use authorization under Planning Code Section 304 for a Planned Unit Development and/or subsequent motion for the Planning Commission will contain the analysis determining whether the proposed project is in compliance with the eight Priority Policies.

The project sponsor is requesting approval of a Planned Unit Development (PUD) under Section 304 of the City Planning Code which requires a conditional use authorization from the City Planning Commission. A PUD allows for development of sites of considerable size (greater than one-half acre) as an integrated unit and permits well reasoned modifications of certain provisions of the Planning Code such as parking, open space, rear yard, and bulk standards. Conditional use authorization is also required for residential units in a C-M zoning district.

The project at 1880 Mission Street would require Conditional Use authorization for a Planned Unit Development (PUD) since the lot area totals more than 40,000 sf, for dwelling units in a C-M zoning district, and for modification of bulk requirements. The project would to include 39 affordable

residential units. The project would also provide about 1,500 sf of non-profit art space, as well as lobby display space.

The project site falls within the Mission District Interim Controls area, first adopted by the Board of Supervisors in 2001, which contain sub-districts for which different zoning rules apply. One of these sub-areas is the Northeast Mission Industrial Zone (NEMIZ), which was established by the Planning Commission by Resolution 13794 in 1994. The 1880 Mission Street site is outside the Industrial Protection Zone (IPZ) of the NEMIZ area.

The Planning Department is proceeding with the Eastern Neighborhoods Rezoning and Community Plans. The Environmental Impact Report for the Eastern Neighborhoods plans is underway, the adoption of the rezoning and plans may occur in 2006. That project is a revision of Planning Code (zoning) controls governing four of the City's Eastern Neighborhoods: the Central Waterfront, the Mission District, Showplace Square/Potrero Hill, and the eastern portion of the South of Market district ("Eastern SoMa"). The project would include amendments to the San Francisco General Plan, including the existing Central Waterfront and South of Market Area Plans and preparation and adoption of new neighborhood or community plans for the Mission, Showplace Square/Potrero Hill, and Eastern SoMa. The plans would be intended to permit housing development in some areas currently zoned for industrial use while preserving an adequate supply of land for production, distribution and repair (PDR) (generally, light industrial) employment and businesses. The proposed rezoning would introduce new zoning districts, including several mixed-use districts designed to preserve PDR uses; other mixed-use districts where residential and commercial uses would be allowed; and new residential districts. Improvements to the streetscape, transportation system, and open space, as well as new urban design policies, may result from implementation to the new plans. As it is unknown at this time what specific changes in zoning may be developed in the future for the project site or vicinity, this Initial Study evaluates the proposed project in terms of its relationship to existing zoning controls, and in terms of its potential impact on the existing environmental setting.

B. ENVIRONMENTAL EFFECTS

1) <u>Land Use</u> – Could the project:	<u>Yes</u>	<u>No</u>	<u>Discussed</u>
(a) Disrupt or divide the physical arrangement of an established community?	_____	<u>X</u>	<u>X</u>
(b) Have any substantial impact upon the existing character of the vicinity?	_____	<u>X</u>	<u>X</u>

The project site is in San Francisco's Mission District neighborhood. The proposed project would be constructed on a site abutted by a vacant parcel to the north, and street frontages on the east, south and west sides. The building adjacent to the vacant site to the north is a community service building and the vacant Armory Building. The proposed rehabilitation of the State Armory and Arsenal building at 1800 Mission Street, a designated San Francisco historic landmark, would entail conversion of the Mission Street wing of the building, formerly containing offices, classrooms, and barracks) to residential units and the construction of a new free standing structure within the former drill court that now occupies the western two-thirds of the project site. The project would add 194 residential units and would include about 180 off-street parking spaces in a below-grade parking garage. The building across Mission Street to the east is a three-story commercial building, immediately across 15th Street to the south is a two-story commercial building and three-story residential building. The large blocks are bisected by narrower streets lined primarily with two- to four-story multi-family dwellings. Two- to four-story residences, many with ground floor retail, also line much of the major thoroughfares of Mission Street and Valencia Street. Vincentian Villa, senior residential facility, is across Mission Street and north of the project site. Valencia Gardens, a former public housing site, is one block to the west and is under construction as a HOPE VI affordable residential and commercial development, with

290 units. Retail and commercial uses include automotive repair and sales, storage spaces, liquor and grocery stores, a glass works, a sausage factory, and restaurants. Small parking lots for private parking and used/new car sales are also a common use. Across Julian Street from the project site is the Native American Drug Rehabilitation Center. A few medium sized office buildings are located two blocks away on the opposite side of the Central Freeway.

In terms of the height, scale, density and type of use on this specific site, and relative to the nearby uses along Mission Street and Julian Street, the proposed project would represent a substantial change in land use on the site, and departure from the type and scale of surrounding development. The project height and scale would be roughly double that of most nearby structures, with the exception of the Armory. With respect to Mission Street, the project would introduce a far greater number of dwelling units than exist nearby. With respect to Julian Street, the introduction of residential use to the site would be a new use on this particular block of Julian, and would be at a higher scale and density than exists on the blocks to the north and south.

Land use impacts are considered to be significant if they disrupt or divide the physical arrangement of an established community, or if they have a substantial impact upon the existing character of the vicinity. While the proposed project would undoubtedly represent a very large new development at this site, the Department does not believe that the project would amount to a significant adverse land use impact. The project would constitute a large physical development, anchoring the southern portion of its block, as does the Armory building at the northern end of the block. The project would not disrupt or divide the physical arrangement of existing uses and activities that surround it. Those surrounding uses and activities would continue on their own sites and would interrelate with each other as they do at present, without significant disruption from the proposed project. Even at this large size, scale and density, the proposed project would fit within the existing height limit and allowable residential density as a Planned Unit Development. The type and mix of uses would also be generally consistent with the prevailing land uses along Mission and Julian Streets, though at a higher density and scale. Nevertheless, that greater scale and density at this one particular site is not considered to be of such a size or magnitude that it would significantly alter the prevailing character of the area. Therefore, the EIR will not discuss land use further.

2) <u>Visual Quality</u> – Could the project:	<u>Yes</u>	<u>No</u>	<u>Discussed</u>
(a) Have a substantial, demonstrable negative aesthetic effect?	_____	<u>X</u>	<u>X</u>
(b) Substantially degrade or obstruct any scenic view or vista now observed from public areas?	_____	<u>X</u>	<u>X</u>
(c) Generate obtrusive light or glare substantially impacting other properties?	_____	<u>X</u>	<u>X</u>

Design and aesthetics are by definition subjective, open to interpretation by decision makers and members of the public. A proposed project would therefore be considered to have a significant adverse effect on visual quality only if it would cause a substantial and demonstrable negative change. The proposed project would not cause such a change.

The existing visual characteristics in the vicinity of the project site are varied, reflecting changing development patterns, land uses and architectural styles in the area over the past hundred years. Dominant visual features along Mission Street and 15th Street include large brick building (the Armory); industrial-looking and commercial buildings and a collection of residential and mixed use buildings.

The proposed project would result in a visual change to the project site since it would involve the demolition of the two existing buildings, one built in 1906 (Lot 3) and the other building built in 1951 (Lot 4). The proposed project building, would be taller (at approximately 50 to 65 feet) than the adjacent buildings to the north and west, but would not be out of character with the massing of nearby buildings.

The project, which would be larger in scale and density than buildings in the vicinity, would be readily apparent in short- and mid-range views of the site from Mission Street, 15th Street, Julian Street, and parts of Valencia Street. However, the project, in long-range views of the site, would be seen as part of the densely built urban fabric of the area. Architecturally, the proposed building would be of a contemporary Latin design, with elements intended to relate in style to existing structures in the vicinity. Additionally, the project would comply with Planning Commission Resolution 9212, which prohibits the use of mirrored or reflective glass. Thus, the project would not produce glare affecting other properties.

There are no scenic public views or vistas now available that would be affected by the project. The site and surrounding areas are developed with structures. Views from nearby private lots over the existing site would be blocked by the proposed six-story structure. The impact upon private views by a project on an infill site, consistent with existing zoning and height and bulk requirements, would not be considered a significant effect on the environment. Similarly, since there would be no substantial public view, or neighborhood character effects, the project would not have substantial, demonstrable negative aesthetic effect.

The project would be large in scale and visually prominent compared to its existing surroundings. Buildings of this size and scale are not common in this portion of the Mission District area; however, a new larger visual element consistent with existing height and bulk controls would not in and of itself constitute a significant impact. The project area has a commercial and residential setting and the proposed building would not block or degrade a scenic view or vista. The commercial/residential uses would not result substantially more light or glare than do the existing commercial and residential uses in the neighborhood. Therefore, the EIR will not discuss visual quality further.

3) <u>Population</u> – Could the project:	<u>Yes</u>	<u>No</u>	<u>Discussed</u>
(a) Induce substantial growth or concentration of population?	_____	<u>X</u>	<u>X</u>
(b) Displace a large number of people (involving either housing or employment)?	_____	<u>X</u>	<u>X</u>
(c) Create a substantial demand for additional housing in San Francisco, or substantially reduces the housing supply?	_____	<u>X</u>	<u>X</u>

The proposed 194 dwelling units could attract up to about 445¹ net new residents and approximately 80 net new employees to the site. While potentially noticeable to immediately adjacent neighbors, the increase in population on the site would not substantially increase the existing area-wide population, because the project area is a dense and populated urban area with existing commercial and residential uses.

As the existing commercial structures on the site employ approximately 14 people, there would be direct business displacement caused by demolition of those structures. The existing printing company and its associated offices would be displaced from the site and may or may not be able to find other

¹ Based on the City’s average of 2.3 persons per household as assessed in the Census 2000.

suitable space in the City. The proposed project would employ approximately 94 people in office and retail jobs. The potential loss from the City of a printing business, together with the jobs and services that it provides, is a socioeconomic issue which should be taken into consideration by the Planning Commission when considering the proposed project through the required Conditional Use process. While industrial sector jobs tend to be higher paying jobs than retail sector jobs, this too is a socioeconomic issue, important to the City but not germane to the specific issue of physical environmental impacts considered in this document. In terms of numbers of persons alone, this amount of displacement would not be considered a large number of people when balanced against the new employment opportunities created. San Francisco's employment is projected to grow from about 535,000 employees in 1995 to about 665,300 employees in 2015, an increase of 24 percent.² Therefore, project-related employment growth would constitute less than 0.1 percent of citywide employment growth by the year 2015, even if all new employees were conservatively assumed to be all-new to San Francisco. This potential increase in employment would be minimal in the context of the total employment in greater San Francisco.

San Francisco consistently ranks as one of the most expensive housing markets in the United States. San Francisco is the central city in an attractive region known for its agreeable climate, open space and recreational opportunities, cultural amenities, strong and diverse economy, and prominent educational institutions. As a regional employment center, San Francisco attracts people who want to live close to where they work. These factors continue to support strong housing demands in the City. New housing to relieve the market pressure created by the strong demand is particularly difficult to provide in San Francisco because the amount of land available for residential use is limited, and because land and development costs are high.

An estimated 311,400 households existed in San Francisco in 1995. By 2015, San Francisco households are expected to increase by 32,200 households, a 10 percent increase.³ The project would provide 194 net new residential units. These units would help to relieve housing needs in San Francisco and would not aggravate the existing housing imbalance.

In view of the above, the project would not result in significant effects related to population and housing; the EIR will not discuss those further.

4) <u>Transportation/Circulation</u> – Could the project:	<u>Yes</u>	<u>No</u>	<u>Discussed</u>
(a) Cause an increase in traffic which is substantial in relation to the existing traffic load and capacity of the street system?	_____	<u>X</u>	<u>X</u>
(b) Interfere with existing transportation systems, causing substantial alterations to circulation patterns or major traffic hazards?	_____	<u>X</u>	<u>X</u>
(c) Cause a substantial increase in transit demand which cannot be accommodated by existing or proposed transit capacity?		<u>X</u>	<u>X</u>

² Based on a standard multiplier of 276 gross sq. ft. (gsf) per office employee and 350 gsf per retail employee, per San Francisco Planning Department *Transportation Impact Analysis Guidelines for Environmental Review*, October 2002; and Keyser Marston Associates, Inc., *San Francisco Cumulative Growth Scenario: Final Technical Memorandum*, prepared for the San Francisco Redevelopment Agency, March 30, 1998.

³ Keyser Marston Associates, Inc., in Note 1.

4) <u>Transportation/Circulation</u> - Could the project:	<u>Yes</u>	<u>No</u>	<u>Discussed</u>
(d) Cause a substantial increase in parking demand which cannot be accommodated by existing parking facilities?	_____	_____ <u>X</u> _____	_____ <u>X</u> _____

Project-specific impacts are described in this section, as are projected cumulative impacts for the year 2015. The discussion regarding existing, existing plus project and projected cumulative conditions is based on a transportation study prepared for the project, December 26, 2001.⁴ The 2001 Transportation Study analyzed the then-proposed project of 183 residential units, about 25,000 sf of commercial and office space, and 270 parking spaces. The currently proposed project would have 194 units, about 8,000 sf of retail space, and about 221 parking spaces. There would be about 6 percent more residential units, but the former project had about 72 two- and three-bedroom units, compared to about 56 two- and three-bedroom units with the current project. While the total number of units now proposed would increase overall trip generation, the greater number of one-bedroom units would have a lower trip generation rate per unit than two- and three-bedroom units. Trip generation from commercial space would also be lower with the current project. Thus, total daily and peak-hour person-trip and vehicle-trip generation would be similar to that analyzed in 2001. The reduced number of parking spaces would also not be expected to change conclusions of the 2001 study. Therefore, the overall transportation effects of the current project would be similar to those analyzed in 2001 and presented in this Initial Study.

Traffic

The proposed project would generate about 5,155 net new person trips, with a total of about 584 net new person trips during the p.m. peak hour, of which about 164 would be vehicle trips,⁵ 179 would be transit trips, and 124 would be by other modes such as walking, bicycle, motorcycle and taxi.⁶

Seven signalized intersections and two unsignalized intersections in the project vicinity were evaluated to determine traffic operating conditions under current roadway network conditions in the immediate project vicinity. All study intersections currently operate at acceptable (LOS D or better) service levels during the p.m. peak hour, except the intersection of 13th-Duboce/Mission-Otis, which operates at an unacceptable LOS F, largely due to heavy volumes heading towards the South Van Ness Avenue on-ramp to the Central Freeway (U.S. 101). Movements at the two unsignalized study intersections (i.e. left and right turns from Julian Street onto 14th and 15th Street) experience minor delays (LOS B).

With the addition of project traffic, delays at the signalized intersection of 13th-Duboce/Mission-Otis Streets, which currently operates at an unacceptable LOS F, would increase by about two seconds. Operating conditions at the other eight study intersections would remain acceptable (i.e., service levels would be LOS D or better) with the addition of project-generated traffic. The City has not planned any modifications for the study intersections. Project impacts would be less-than-significant.

⁴ 1886 Mission Street Residential Building Transportation Report, December 26, 2001, prepared by Environmental Science Associates. This report is available for public review by appointment at the Planning Department, 1660 Mission Street, Project File No. 2000.1164E.

⁵ The 164 vehicle trips represent about 284 person-trips by vehicle; the number of vehicle trips is less than the number of person trips by vehicle, because some person trips are made in vehicles carrying more than one person.

⁶ Travel demand estimates were made on the basis of information in the Planning Department's *Interim Transportation Impact Analysis Guidelines for Environmental Review*, January 2000.

Under longer-range cumulative (2015) conditions, with other development in the vicinity, intersection levels of service at six of the nine study intersections would be acceptable (LOS D or better), but unacceptable (LOS E or F) conditions would prevail at the signalized intersections of 15th/Valencia, 14th/Valencia, and 13th-Duboce/Mission-Otis. Project traffic would represent only two to three percent of all traffic in the movements, which would not considerably affect the adverse cumulative LOS conditions. The project's 164 p.m. peak-hour vehicle would not represent a considerable contribution to cumulative operating conditions at any intersections in the vicinity that would be acceptable at LOS E or F, and therefore the project's traffic impacts with cumulative 2015 conditions would be less than significant.⁷

Traffic trips generated by the proposed project would not deteriorate the LOS at the analyzed intersections. However, some measures that might help to improve intersection performance are included in this document. (see Improvement Measure 4, p. 31)

Transit

The proposed project would generate about 180 net new p.m. peak-hour transit (mainly Muni) trips. Analysis of transit impacts focuses on the increase in transit patronage on the three main bus routes in the area in the peak-ridership direction during the p.m. peak period. The 14-Mission, 22-Fillmore, and 49-Van Ness/Mission Muni routes that serve the project area operate in the peak direction with p.m. peak-period capacity utilization of about 63 percent (14-Mission), 70 percent (22-Fillmore), and 74 percent (49-Van Ness/Mission), respectively. These capacity utilizations fall within Muni's established level of service standard, which assumes a substantial number of standees of each vehicle type. The other bus routes in the area (e.g., the Muni 26-Valencia and 53-Southern Heights, as well as SamTrans) have lower ridership levels than the above-cited three routes.

On the basis of frequency-of-service data, there are about 26 to 27 buses in the main lines serving the project area in the p.m. peak hour (i.e., 8 buses on the 14-Mission, 10 buses on the 22-Fillmore, and 8 to 9 buses on the 49-Van Ness/Mission). Potential project impacts were assessed by assigning the 180 added p.m. peak-hour transit riders that the project would generate to these three bus routes. The addition of the project peak-hour Muni riders would increase percent capacity utilization, but would not alter peak-direction transit loadings to the degree that Muni level of service standards would be exceeded. This does not mean, however, that project impacts on Muni would not be perceptible. The project would contribute to crowding at some times, and an individual's experience on certain lines and at certain times could be in apparent conflict with the overall conditions. Ridership on the other Muni routes serving the project area (e.g., 26-Valencia and 53-Southern Heights) is not expected to increase to a substantial degree. Addition of riders from the project onto regional transit carriers (e.g., BART at 16th Street Station and SamTrans running on South Van Ness Avenue) would not be measurable against the day-to-day fluctuations in transit ridership. The project would, however, contribute to cumulative increases in transit ridership that would result in a marginal increase in loading ratios (and deteriorate levels of service).

Under longer-range cumulative (2015) conditions, the projected growth in Muni ridership in this corridor for the 2015 conditions is not expected to exceed the operating capacity. The proposed

⁷ The *Market & Octavia Plan EIR Transportation Study, Case No. 2003.0346E, Final Report*, January 20, 2005, analyzed 2025 cumulative conditions at one of the intersections also analyzed in the 1886 Mission Street Transportation Study -13th/Duboce/ Mission/Otis - and found that it would operate at LOS E in 2025. It would not be expected that the proposed project would represent a considerable contribution to this 2025 cumulative condition at 13th /Duboce/ Mission/Otis. The *Market & Octavia Plan EIR Transportation Study* is available for public review by appointment at the Planning Department, 1660 Mission Street.

project's contribution to the cumulative transit ridership would be minimal, and the project alone would not significantly affect the peak hour capacity utilization.

Parking

The project would create an estimated short-term demand of 110 parking spaces, an estimated long-term demand of 320 spaces, for a total parking demand of 430 spaces.

As noted above, the parking analysis is based on the project reviewed in the 2001 Transportation Study. Under the proposed project, there would be 218 off-street parking spaces on two levels of subsurface parking area (totaling about 62,200 gsf), of which 42 would consist of 21 pairs of tandem spaces, and 176 independently-accessible single stalls. The garage would also provide 12 motorcycle parking spaces. The project sponsor proposes to develop a managed parking program to provide priority leased parking to residents supplemental to their designated parking, and managed valet parking for commercial tenants, visitors/customers and the general public. Under the managed parking program, the project sponsor anticipates that the use of valet parking attendants could allow the garage to accommodate up to about 275 vehicles. However, the analysis conservatively assumes an on-site parking supply of 218 spaces that would be used by residents and by employees of the project's commercial space. The project's supply of off-street parking spaces would produce a total unmet demand of up to about 212 equivalent daily spaces (i.e., total project demand [430] minus dedicated parking capacity [218] equals 212 spaces total unmet demand). There is a general absence of off-street public parking facilities (lots and garages) in proximity to the project site, and the approximately 275 off-street spaces that do exist have mid-afternoon occupancy rate of about 93 percent (i.e., about 20 vacant spaces). On-street parking in the area is primarily controlled by parking meters (with a one- or two-hour time limit) or by residential permit parking regulations (i.e. limiting non-residents to two-hour parking). The effective availability rate for on-street parking spaces during the mid-afternoon period is lower than the 9 percent (i.e., 91 percent occupied) that exists for all legal spaces in the area because about one-third of the unoccupied on-street parking spaces (about 45 of 135 spaces) were yellow, blue, green and motorcycle spaces. The occupancy rate for general metered and unmetered spaces that could be used for short-term parking is about 93 percent. The project-generated demand for about 110 short-term parking spaces, generated by the project's proposed retail uses, and assumed to not use the on-site parking spaces, would exceed the 90 vacant general on-street spaces within a reasonable walking distance of the project site, and would create a short-term parking deficit of about 20 spaces, assuming no change in travel modes used by visitors to the project building.

The unmet long-term parking demand of about 100 spaces would exceed the 20 vacant spaces in the off-street parking facilities within a reasonable walking distance of the project site, and would create a long-term parking deficit of about 80 spaces, assuming no change in auto ownership by project residents and/or in travel modes used by employees of the project building. With no change in travel mode away from private automobiles, the total parking deficit (100 spaces) would result in drivers that come to the area being forced to park farther away from their destination (i.e., outside a ¼-mile radius of the project site) or in an increase in illegal on-street parking.

Under California Public Resources Code Section 21060.5, "environment" means "the physical conditions which exist within the area which will be affected by a proposed project, including land, air, water, minerals, flora, fauna, noise, and objects of historic or aesthetic significance." Parking supply is not considered to be a part of the permanent physical environment in San Francisco. Parking conditions are not a static condition, as parking supply/demand varies from day to night, from day to day, month to month, etc. Hence, the availability of parking spaces (or lack thereof) is not a permanent physical condition, but changes over time as people change their modes and patterns of

travel. Therefore, parking deficits are considered to be social effects, rather than impacts on the physical environment as defined by CEQA.

Parking deficits may be associated with secondary physical environmental impacts, such as increased traffic congestion at intersections, air quality, or noise effects caused by congestion. However, as noted above, in the experience of San Francisco transportation planners, the absence of a ready supply of parking spaces combined with available alternatives to auto travel (e.g., transit service, taxis, bicycles or travel by foot) and relatively dense patterns of urban development, may induce drivers to seek and find alternative parking facilities, shift to other modes of travel, or change their overall travel habits. Any such resulting shifts to transit service, in particular, would be in keeping with the City's "Transit First" policy.

Additionally, regarding potential secondary effects, cars circling and looking for a parking space in areas of limited parking supply is typically a temporary condition, often offset by a reduction in vehicle trips due to others who are aware of constrained parking conditions in a given area. Hence, any secondary environmental impacts which may result from a shortfall in parking in the vicinity of the proposed project would likely be minor and difficult to predict.

Thus, a parking shortage is not considered to be a permanent condition and is also not considered to be a physical environmental impact even though it is understood to be an inconvenience to drivers. Therefore, the creation of or an increase in parking demand resulting from a proposed project that cannot be met by existing or proposed parking facilities would not itself be considered a significant environmental effect under CEQA. In the absence of such physical environmental impacts, CEQA does not require environmental documents to propose mitigation measures solely because a project is expected to generate parking shortfalls.

Loading

After construction of the project, there would be two loading docks located off Julian Street. The number of off-street freight loading spaces required is calculated based on loading standards from the San Francisco Planning Code. These loading standards would yield a requirement of 2.0 loading spaces for the project. The Code requirement would be satisfied with the loading spaces being supplied. This project would slightly increase the number of delivery vehicles along 15th Street and Julian Street. However, most deliveries occur during non-PM peak period, and would not impact the PM peak traffic conditions.

Pedestrian and Bicycle Conditions

Pedestrian entrances to the project building would be at midblock on 15th Street, as well as at the corner of 15th/Mission and along Mission Street. Based on field observations, pedestrian flows on area sidewalks and crosswalks are representative of "open" conditions, indicating that pedestrians have complete freedom to select the speed and direction of movement, with an absence of physical conflicts and no interaction with other pedestrians. Pedestrian flow conditions with the project would be expected to remain similar to existing conditions. That expectation is primarily based on the available width of the sidewalks and the current "open" pedestrian flow conditions.

There are Citywide Bicycle Routes in the project vicinity (on Valencia, Market and 14th Streets). Only portions of Market Street have bike lanes. Each of these streets has bicycle lanes. Bicyclists were observed on those streets, not so designated, in the project area, although the number of bicyclists was not high. The project would not be expected to generate a noticeable increase in bicycles in the area, nor would it be expected to noticeably affect existing bicycle conditions in the area. The project would

provide 25 bicycle parking spaces, which is more than the 9 spaces required by Planning Code Section 155.2.

Construction Impacts

During the projected 16-month construction period, temporary and intermittent traffic and transit impacts would result from truck movements to and from the project site. Truck movements during periods of peak traffic flow would have greater potential to create conflicts than during non-peak hours because of the greater numbers of vehicles on the streets during the peak hour that would have to maneuver around queued trucks. The project sponsor would reduce these effects, as it is the sponsor's intent to restrict project-related truck traffic to non-peak hours, subject to the approval of the Department of Parking and Traffic (DPT). The project sponsor has agreed to meet with MUNI, DPT, Interdepartmental Staff Committee on Traffic and Transportation (ISCOTT), and other responsible agencies to coordinate construction activities so as to minimize construction impacts on vehicular and pedestrian traffic.

Temporary parking demand from construction workers' vehicles, and impacts on local intersections from construction worker traffic, would occur in proportion to the number of construction workers who would use automobiles. The most intensive construction phases of the project would result in about 30 construction workers per day. Parking of construction workers' vehicles would temporarily increase occupancy levels in on-street parking spaces, either by those vehicles or by vehicles currently parking in on-street spaces that would be displaced by construction workers' vehicles. It is possible that project construction activity would overlap with that of other nearby projects. As a condition of street closures, use of parking lanes for construction, and other permits, the City could require that construction contractors for multiple projects meet to determine ways to minimize traffic and transit disruption due to construction activities. Construction-related impacts on parking and traffic would be less than significant.

The EIR will not discuss Transportation/Circulation further.

5) <u>Noise</u> – Could the project:	<u>Yes</u>	<u>No</u>	<u>Discussed</u>
(a) Increase substantially the ambient noise levels for adjoining areas?	_____	<u>X</u>	<u>X</u>
(b) Violate Title 24 Noise Insulation Standards, if applicable?	_____	<u>X</u>	_____
(c) Be substantially impacted by existing noise levels?	_____	<u>X</u>	<u>X</u>

Traffic Noise

Ambient noise levels in the vicinity of the project are typical of noise levels on busy San Francisco streets, which are dominated by vehicular traffic, including trucks, cars, MUNI buses, and emergency vehicles. Generally, traffic must double in volume to produce a noticeable increase in noise levels. Traffic volumes would not be expected to double on any streets as a result of the project; therefore, substantial increases in traffic noise in the project area would not be anticipated. Traffic noise therefore would not be significant.

Building Equipment Noise

The proposed project would include mechanical equipment, such as air conditioning units and chillers, which could produce operational noise. These operations would be subject to the San Francisco Noise Ordinance, Article 29 of the San Francisco Police Code. Compliance with Article 29, Section 2909, would minimize noise from building operations. Therefore, effects related to operational noise would not be significant.

Construction Noise

Building construction activities would temporarily increase noise in the site vicinity. Construction equipment would generate noise and possibly vibrations that could be considered an annoyance by occupants of nearby properties. To mitigate any impacts associated with noise generated from project construction, the project would comply with regulations set forth in the San Francisco Noise Ordinance. Impact tools (jackhammers, hoerammers, impact wrenches) must have both intake and exhaust muffled to the satisfaction of the Director of Public Works. Section 2908 of the Ordinance prohibits construction work between 8:00 p.m. and 7:00 a.m., if noise would exceed the ambient noise level by five dBA at the project property line, unless a special permit is authorized by the Director of Public Works.

The construction period would last approximately 16 months. Construction noise levels would fluctuate depending on construction phase, equipment type and duration of use, distance between noise source and listener, and presence or absence of barriers. Impacts would be limited to the period during which the exterior structural and facade elements would be built. Interior renovation noise would be substantially reduced by the exterior walls. In light of the above, effects related to construction noise would not be significant.

The EIR will not discuss noise effects further.

6) <u>Air Quality/Climate</u> – Could the project:	<u>Yes</u>	<u>No</u>	<u>Discussed</u>
(a) Violate any ambient air quality standard or contribute substantially to an existing or projected air quality violation?	_____	<u>X</u>	<u>X</u>
(b) Expose sensitive receptors to substantial pollutant concentrations?	_____	<u>X</u>	<u>X</u>
(c) Permeate its vicinity with objectionable odors?	_____	<u>X</u>	_____
(d) Alter wind, moisture or temperature (including sun shading effects) so as to substantially affect public areas, or change the climate either in the community or region?	_____	<u>X</u>	<u>X</u>

Emissions from Operations

The Bay Area Air Quality Management District (BAAQMD) has established thresholds for projects requiring its review for potential air quality impacts. Generally, for residential projects, the threshold is 530 units, and for retail uses, approximately 80,000 sf. These thresholds are based on the minimum size projects which the District considers capable of producing air quality problems due to vehicular emissions. The project would not exceed this minimum standard. Therefore, no significant air quality impacts due to vehicular emissions would be generated by the proposal.

Construction Emissions

Because the project would involve only limited earthmoving activities, effects of ground-disturbing construction on local air quality would be minimal. To the extent that the project would generate dust from earthmoving or demolition, it could cause a temporary increase in particulate dust and other pollutants. Heavy equipment could create fugitive dust and emit nitrogen oxides (NO_X), carbon monoxide (CO), sulfur dioxide (SO₂), hydrocarbons (HC), and particulate matter with a diameter of less than 10 microns (PM₁₀) as a result of diesel fuel combustion.

Dust emission during demolition and the removal of the existing buildings would increase particulate concentrations near the site. Dustfall can be expected at times on surfaces located within 200 to 800 feet of the project site. Under winds exceeding 12 miles per hour, localized effects including human discomfort might occur downwind from blowing dust. Construction dust is composed primarily of particularly large particles that settle out of the atmosphere more rapidly with increasing distance from the source and are easily filtered by human breathing passages. In general, construction dust would result in more of a nuisance than a health hazard in the vicinity of construction activities. About one-third of the dust generated by construction activities consists of smaller size particles in the range that can be inhaled by humans (i.e., particles 10 microns or smaller in diameter), known as PM₁₀, although those particles are generally inert. Persons with respiratory diseases immediately downwind of the site, as well as any unprotected electronics equipment, could be sensitive to this dust.

The BAAQMD, in its CEQA Guidelines, has identified a set of feasible PM₁₀ control measures for construction activities that would be included as project conditions. The project sponsor would require the contractor to wet down the construction site twice a day during construction to reduce particulates by at least 50 percent; would require covering soil, sand and other material; and would require street sweeping around demolition and construction sites at least once per day (see Mitigation Measure 2, p. 25). With implementation of this measure, construction-related air quality effects would be reduced to a less-than-significant level.

The EIR will not discuss air quality effects further.

Shadow

Section 295 of the City Planning Code was adopted in response to Proposition K (passed November 1984) in order to protect certain public open spaces from shadowing by new structures during the period between one hour after sunrise and one hour before sunset, year round. Section 295 restricts new shadow upon public spaces under the jurisdiction of the Recreation and Park Department by any structure exceeding 40 feet unless the City Planning Commission finds the impact to be insignificant. To determine whether this project would conform to Section 295, a shadow fan analysis was prepared by the Department of City Planning. This analysis determined that the project shadow would not shade public areas subject to Section 295. (A copy of the shadow analysis is available for review at the Planning Department, 1660 Mission Street;) Because of the proposed building height and the configuration of existing buildings in the vicinity, the net new shading which would result from the project's construction would be limited in scope, and would not increase the total amount of shading above levels which are common and generally accepted in urban areas.

The EIR will not discuss shadow effects further.

7) <u>Utilities/Public Services</u> – Could the project:	<u>Yes</u>	<u>No</u>	<u>Discussed</u>
(a) Breach published national, state or local standards relating to solid waste or litter control?	_____	<u>X</u>	_____
(b) Extend a sewer trunk line with capacity to serve new development?	_____	<u>X</u>	_____
(c) Substantially increase demand for schools, recreation or other public facilities?	_____	<u>X</u>	_____
(d) Require major expansion of power, water, or communications facilities?	_____	<u>X</u>	<u>X</u>

The proposed project would incrementally increase demand for and use of public services and utilities on the site and increase water consumption, but not in excess of amounts expected and provided for in the project area. San Francisco consumers have recently experienced rising energy costs and uncertainties regarding the supply of electricity. The root causes of these conditions are under investigation and are the subject to much debate. Part of the problem may be that the State does not generate sufficient energy to meet its demand and must import energy from outside sources. Another part of the problem may be the lack of cost controls as a result of deregulation. The California Energy Commission (CEC) is currently considering applications for the development of new power-generating facilities in San Francisco, the Bay Area, and elsewhere in the State. These facilities could supply additional energy to the power supply “grid” within the next few years. The project-generated demand for electricity would be negligible in the context of overall demand within San Francisco and the State, and would not in and of itself require a major expansion of power facilities. Therefore, the energy demand associated with the proposed project would not result in a significant physical environmental effect.

The proposed building would be designed to incorporate water-conserving measures, such as installing low-flush toilets, as required by California State Building Code Section 402.0(c). Therefore, effects related to public services and utilities would not be significant, and the EIR will not discuss these effects.

8) <u>Biology</u> – Could the project:	<u>Yes</u>	<u>No</u>	<u>Discussed</u>
(a) Substantially affect a rare or endangered species of animal or plant or the habitat of the species?	_____	<u>X</u>	<u>X</u>
(b) Substantially diminish habitat for fish, wildlife or plants, or interfere substantially with the movement of any resident or migratory fish or wildlife species?	_____	<u>X</u>	<u>X</u>
(c) Require removal of substantial numbers of mature, scenic trees?	_____	<u>X</u>	_____

The project site is covered completely by existing buildings. There are no trees or other vegetation on the site. The project would not affect any threatened, rare or endangered animal or plant life or habitat. The project would not interfere with any resident or migratory species. Therefore, effects related to biology would not be significant. The EIR will not discuss biology effects further.

9) <u>Geology/Topography</u> – Could the project:	<u>Yes</u>	<u>No</u>	<u>Discussed</u>
(a) Expose people or structures to major geologic hazards (slides, subsidence, erosion and liquefaction)?	_____	<u>X</u>	<u>X</u>
(b) Change substantially the topography or any unique geologic or physical features of the site?	_____	<u>X</u>	<u>X</u>

The San Francisco General Plan Community Safety Element contains maps that show areas in the city subject to geologic hazards. The project site is located in an area subject to groundshaking from earthquakes along the San Andreas and Northern Hayward Faults and other faults in the San Francisco Bay Area (Maps 2 and 3). The project site is not located in an area of liquefaction potential (Map 4). The project site is also not located in an area susceptible to landslide (Map 5). To ensure compliance with all San Francisco Building Code provisions regarding structural safety, when the Department of Building Inspection (DBI) reviews the building plans for a proposed project, it will determine necessary engineering and design features for the project to reduce potential damage to structures from groundshaking. Therefore, potential damage to structures from geologic hazards on the project site would be mitigated if necessary based on DBI's assessment. The project would not significantly alter the topography of the site, or otherwise affect any unique geologic or physical features of the site. Therefore, no further analysis of geology and seismicity is required in the EIR.

10) <u>Water</u> – Could the project:	<u>Yes</u>	<u>No</u>	<u>Discussed</u>
(a) Substantially degrade water quality, or contaminate a public water supply?	_____	<u>X</u>	<u>X</u>
(b) Substantially degrade or deplete ground-water resources, or interfere substantially with groundwater recharge?	_____	<u>X</u>	<u>X</u>
(c) Cause substantial flooding, erosion or siltation?	_____	<u>X</u>	_____

The project site is covered completely by buildings and pavement. The project would not substantially change the amount of impervious surface area, and would not measurably affect current runoff or groundwater. Therefore, neither groundwater resources nor runoff and drainage would be adversely affected.

In light of the above, effects related to water resources would not be significant; the EIR will not discuss these effects further.

11) <u>Energy/Natural Resources</u> – Could the project:	<u>Yes</u>	<u>No</u>	<u>Discussed</u>
(a) Encourage activities which result in the use of large amounts of fuel, water, or energy, or use these in a wasteful manner?	_____	<u>X</u>	<u>X</u>
(b) Have a substantial effect on the potential use, extraction, or depletion of a natural resource?	_____	<u>X</u>	_____

New buildings in San Francisco are required to conform to energy conservation standards specified by Title 24 of the California Code of Regulations. Documentation showing compliance with these standards is submitted with the application for the building permit. The Department of Building

Inspection enforces title 24. The project would meet current state and local codes concerning energy consumption. It would not cause a wasteful use of energy and thus, effects related to energy consumption would not be significant and would therefore require no further analysis in the EIR.

12) <u>Hazards</u> – Could the project:	<u>Yes</u>	<u>No</u>	<u>Discussed</u>
(a) Create a potential public health hazard or involve the use, production or disposal of materials which pose a hazard to people or animal or plant populations in the area affected?	_____	<u>X</u>	<u>X</u>
(b) Interfere with emergency response plans or emergency evacuation plans?	_____	<u>X</u>	<u>X</u>
(c) Create a potentially substantial fire hazard?	_____	<u>X</u>	<u>X</u>

Hazardous Materials

A Phase I Site Assessment (ESA) of the project site was conducted by an independent consultant (PHR Environmental Consultants, Inc., July 27, 2000). The Phase I ESA was conducted to identify possible environmental concerns related to on-site or nearby chemical use, storage, handling, spillage, and/or on-site disposal, with particular focus on potential degradation of soil and groundwater quality. A copy of the Phase I ESA is available for review at the Planning Department.

The ESA report indicates that in 1908, the site was used as the Louis Roesch Company, lithography and printing, which is the current occupant. The original portion of the building located on the eastern end of the site was constructed in 1906, while the western end of the building was constructed in 1951.

The main office is located on the east end of the first floor, fronting Mission Street. Also on the east side of the building on the first floor are the Graphics Department, film storage, die storage, paper storage, the Plate Room, and the Layout Room. The Bindery Department and empty drum storage area are located in the center of the building on the first floor. The Foil Stamp Department, ink storage, paper storage and two color presses are located on the west end of the building. A liquid hazardous materials storage room is elevated several feet above the floor of the western portion of the building, and is ventilated.

The second floor is L-shaped and located over the southeast portion of the building only. It contains the Art Department including a camera room, two dark rooms, several offices, and storage areas. The basement, which is used only for finished goods storage, is located in the southeast portion of the building as well.

Varying amounts of soy-based inks, lubricating and hydraulic oil, isopropyl alcohol, photographic chemicals, and cleaners are stored and used on-site. All hazardous materials appeared to be properly stored at the time of inspection. The site is a small quantity hazardous waste generator, and has been assigned an EPA identification number. All hazardous waste is stored in a separate, elevated storage room. The site also uses a silver recovery unit to treat photographic fixer prior to discharge to the sewer system. No stains or other evidence of any spills or leaks were noted near any of hazardous materials storage areas nor near the hazardous waste storage area.

Two underground storage tanks are located on the west side of the building, in the sidewalk fronting Julian Street. According to Bob Davos, the company representative, the USTs were filled with water five years ago, as directed by the EPA. Mr. Davos stated that the USTs had been empty for

approximately 25 years prior to being filled with water. Mr. Davos could not provide any supporting documentation regarding the USTs. None of the local agencies contacted, the Fire Department, Public Health Department, or RWQCB have any information regarding USTs, although the project site does appear in the environmental database report under the registered UST list. One active LUST site was identified within ¼ mile southwest of the project site, but does not appear likely to impact the subject site. No visual or documentary evidence was found to indicate that the project site might be adversely impacted by any nearby properties.

Based on the findings of the Phase I ESA, PHR Inc. recommended that a limited subsurface investigation be conducted within the site to assess the potential presence of contaminants associated with existing and former activities conducted at the site and adjacent facilities that could have potentially impacted the site.

Where hazardous wastes are found in excess of state or federal standards, the sponsor would be required to submit a site mitigation plan (SMP) to the appropriate state or federal agency(ies), and to implement an approved SMP prior to issuance of any building permit. Where toxics are found for which no standards are established, the sponsor would request a determination from state and federal agencies as to whether an SMP is needed.

Since the previous use of the site involved the use of potentially hazardous material, and the proposed project involves disturbing existing soils on the project, the Department has determined that lead-contaminated soil may exist on the site and could be exposed during excavation on the site. Public exposure to lead-contaminated soil would constitute a potential public health hazard.

To reduce or avoid a potential public health hazard from exposure to lead as a result of disturbing lead-contaminated soil during excavation and other construction activities on the project site, the project sponsor would implement Mitigation Measure 2, p. 25.

Hazardous Building Materials

Asbestos

Asbestos-containing materials may be found within the existing structures on site which are proposed to be demolished as part of the project. Section 19827.5 of the California Health and Safety Code, adopted January 1, 1991, requires that local agencies not issue demolition or alteration permits until an applicant has demonstrated compliance with notification requirements under applicable Federal regulations regarding hazardous air pollutants, including asbestos. The Bay Area Air Quality Management District (BAAQMD) is vested by the California legislature with authority to regulate airborne pollutants, including asbestos, through both inspection and law enforcement, and is to be notified ten days in advance of any proposed demolition or abatement work.

Notification includes the names and addresses of operations and persons responsible; description and location of the structure to be demolished/altered including size, age and prior use, and the approximate amount of friable asbestos; scheduled starting and completion dates of demolition or abatement; nature of planned work and methods to be employed; procedures to be employed to meet BAAQMD requirements; and the name and location of the waste disposal site to be used. The District randomly inspects asbestos removal operations. In addition, the District will inspect any removal operation concerning which a complaint has been received.

The local office of the State Occupational Safety and Health Administration (OSHA) must be notified of asbestos abatement to be carried out. Asbestos abatement contractors must follow state regulations contained in 8CCR1529 and 8CCR341.6 through 341.14 where there is asbestos-related work

involving 100 sf or more of asbestos containing material. Asbestos removal contractors must be certified as such by the Contractors Licensing Board of the State of California. The owner of the property where abatement is to occur must have a Hazardous Waste Generator Number assigned by and registered with the Office of the California Department of Health Services in Sacramento. The contractor and hauler of the material is required to file a Hazardous Waste Manifest which details the hauling of the material from the site and the disposal of it. Pursuant to California law, the Department of Building Inspection (DBI) would not issue the required permit until the applicant has complied with the notice requirements described above.

These regulations and procedures, already established as a part of the permit review process, would insure that any potential impacts due to asbestos would be reduced to a level of insignificance.

Lead-Based Paint

Lead paint may be found in the existing buildings, constructed in 1906 and 1951 and proposed for demolition as part of the project. Demolition must comply with Chapter 36 of the San Francisco Building Code, Work Practices for Exterior Lead-Based Paint. Where there is any work that may disturb or remove lead paint on the exterior of any building built prior to December 31, 1978, Chapter 36 requires specific notification and work standards, and identifies prohibited work methods and penalties.

Chapter 36 applies to buildings or steel structures on which original construction was completed prior to 1979 (which are assumed to have lead-based paint on their surfaces), where more than ten total sf of lead-based paint would be disturbed or removed. The ordinance contains performance standards, including establishment of containment barriers, at least as effective at protecting human health and the environment as those in the HUD Guidelines (the most recent Guidelines for Evaluation and Control of Lead-Based Paint Hazards) and identifies prohibited practices that may not be used in disturbance or removal of lead-based paint. Any person performing work subject to the ordinance shall make all reasonable efforts to prevent migration of lead paint contaminants beyond containment barriers during the course of the work, and any person performing regulated work shall make all reasonable efforts to remove all visible lead paint contaminants from all regulated areas of the property prior to completion of the work.

The ordinance also includes notification requirements, contents of notice, and requirements for signs. Notification includes notifying bidders for the work of any paint-inspection reports verifying the presence or absence of lead-based paint in the regulated area of the proposed project. Prior to commencement of work, the responsible party must provide written notice to the Director of the Department of Building Inspection, of the location of the project; the nature and approximate square footage of the painted surface being disturbed and/or removed; anticipated job start and completion dates for the work; whether the responsible party has reason to know or presume that lead-based paint is present; whether the building is residential or nonresidential, owner-occupied or rental property, approximate number of dwelling units, if any; the dates by which the responsible party has or will fulfill any tenant or adjacent property notification requirements; and the name, address, telephone number, and pager number of the party who will perform the work. (Further notice requirements include Sign When Containment is Required, Notice by Landlord, Required Notice to Tenants, Availability of Pamphlet related to protection from lead in the home, Notice by Contractor, Early Commencement of Work [by Owner, Requested by Tenant], and Notice of Lead Contaminated Dust or Soil, if applicable.) The ordinance contains provisions regarding inspection and sampling for compliance by DBI, and enforcement, and describes penalties for non-compliance with the requirements of the ordinance.

These regulations and procedures by the San Francisco Building Code would ensure that potential impacts of demolition, due to lead-based paint, would be reduced to a level of insignificance.

Evacuation and Emergency Response

San Francisco ensures fire safety primarily through provisions of the Building Code and the Fire Code. Existing buildings are required to meet standards contained in these codes. In addition, the final building plans for any new residential project greater than two units are reviewed by the San Francisco Fire Department (as well as the Department of Building Inspection), in order to ensure conformance with these provisions. The proposed project would conform to these standards, which (depending on building type) may also include development of an emergency procedure manual and an exit drill plan. In this way, potential fire hazards (including those associated with hillside development, hydrant water pressure, and emergency access) would be mitigated during the permit review process.

The EIR will not discuss hazards further.

13) <u>Cultural</u> – Could the project:	<u>Yes</u>	<u>No</u>	<u>Discussed</u>
(a) Disrupt or adversely affect a prehistoric or historic archaeological site or a property of historic or cultural significance to a community or ethnic or social group; or a paleontological site except as a part of a scientific Study?	<u>X</u>	_____	<u>X</u>
(b) Conflict with established recreational, educational, religious or scientific uses of the area?	_____	<u>X</u>	_____
(c) Conflict with the preservation of buildings subject to the provisions of Article 10 or Article 11 of the City Planning Code?	_____	<u>X</u>	_____

Historic Architectural Resources

The project site contains the existing 1886 Mission Street building, built in 1906 as the Louis Roesch Co. printing plant. The project would demolish this building, as well as a 1951 addition to the west. The EIR will discuss the potential historic architectural significance of the 1886 Mission Street building and whether the demolition would be a significant adverse effect on an historical resource.

Subsurface Resources

The proposed project would involve excavation of about 34,000 cubic yards and 18 feet deep, and there could be the potential for adverse effects on subsurface archaeological resources due to earthmoving activities. There are no currently recorded historic archeological sites identified in the project site. However, the possibility of encountering previously unrecorded historic archeological resources is considered substantial. A mitigation measure has been included herein to address the possible disturbance of subsurface cultural resources (see Mitigation Measure 3. p. 27). The EIR will not discuss these effects further.

C. OTHER

Yes No Discussed

Require approval and/or permits from City Departments other than Planning Department or Department of Building Inspection, or from Regional, State, or Federal Agencies?

_____ X _____

D. MITIGATION MEASURES

Yes No N/A Discussed

- 1) Could the project have significant effects if mitigation measures are not included in the project?
- 2) Are all mitigation measures necessary to eliminate significant effects included in the project?

X _____ _____ X

X _____ _____ X

The following are mitigation measures that have been agreed to by the project sponsor to avoid potentially significant effects of the proposed project.

Mitigation Measure 1: Construction Air Quality

The project sponsor shall require the contractor(s) to spray the site with water during demolition, excavation, and construction activities; spray unpaved construction areas with water at least twice per day; cover stockpiles of soil, sand, and other material; cover trucks hauling debris, soils, sand or other such material; and sweep surrounding streets during demolition, excavation, and construction at least once per day to reduce particulate emissions.

Ordinance 175-91, passed by the Board of Supervisors on May 6, 1991, requires that non-potable water be used for dust control activities. Therefore, the project sponsor shall require the contractor(s) to obtain reclaimed water from the Clean Water Program for this purpose. The project sponsor shall require the project contractor(s) to maintain and operate construction equipment so as to minimize exhaust emissions of particulates and other pollutants, by such means as a prohibition on idling motors when equipment is not in use or when trucks are waiting in queues, and to implement specific maintenance programs to reduce emissions for equipment that would be in frequent use for much of the construction period.

Mitigation Measure 2: Contaminated Soil and Underground Storage Tank Removal

a: Determination of Presence of Lead-Contaminated Soil

Prior to approval of a building permit for the project, the project sponsor shall hire a consultant to collect soil samples (borings) from areas on the site in which soil would be disturbed and test the soil samples for total lead. The consultant shall analyze the soil borings as discrete, not composite samples.

The consultant shall prepare a report on the soil testing for lead that includes the results of the soil testing and a map that shows the locations of stockpiled soils from which the consultant collected the soil samples.

The project sponsor shall submit the report on the soil testing for lead and a fee of \$425 in the form of a check payable to the San Francisco Department of Public Health (SFDPH), to the Hazardous Waste Program, Department of Public Health, 101 Grove Street, Room 214, San Francisco, California 94102. The fee of \$425 shall cover five hours of soil testing report review and administrative handling. If additional review is necessary, DPH shall bill the project sponsor for each additional hour of review over the first five hours, at a rate of \$85 per hour. These fees shall be charged pursuant to Section 31.47(c) of the San Francisco Administrative Code. DPH shall review the soil testing report to determine to whether soils on the project site are contaminated with lead at or above potentially hazardous levels.

If DPH determines that the soils on the project site are not contaminated with lead at or above a potentially hazardous level (i.e., below 50 ppm total lead), no further mitigation measures with regard to lead-contaminated soils on the site would be necessary.

The project sponsor shall implement one of several options for closure of the underground storage tanks. These include in-place closure as well as excavation and removal of the tanks. Under either closure method, DPH would require further characterization of the soil. Remedial actions associated with the underground tanks at the project site, if required by DPH, shall be performed concurrently or shortly following site demolition.

b: Preparation of Site Mitigation Plan:

If based on the results of the soil tests conducted, DPH determines that the soils on the project site are contaminated with lead at or above potentially hazardous levels, the DPH shall determine if preparation of a Site Mitigation Plan (SMP) is warranted. If such a plan is requested by the DPH, the SMP shall include a discussion of the level of lead contamination of soils on the project site and mitigation measures for managing contaminated soils on the site, including, but not limited to: 1) the alternatives for managing contaminated soils on the site (e.g., encapsulation, partial or complete removal, treatment, recycling for reuse, or a combination); 2) the preferred alternative for managing contaminated soils on the site and a brief justification; and 3) the specific practices to be used to handle, haul, and dispose of contaminated soils on the site. The SMP shall be submitted to the DPH for review and approval. A copy of the SMP shall be submitted to the Planning Department to become part of the case file.

c: Handling, Hauling, and Disposal of Lead-Contaminated Soils

- i. Specific Work Practices: If based on the results of the soil tests conducted, DPH determines that the soils on the project site are contaminated with lead at or above potentially hazardous levels, the construction contractor shall be alert for the presence of such soils during excavation and other construction activities on the site (detected through soil odor, color, and texture and results of on-site soil testing), and shall be prepared to handle, profile (i.e., characterize), and dispose of such soils appropriately (i.e., as dictated by local, state, and federal regulations, including OSHA lead-safe work practices) when such soils are encountered on the site.
- ii. Dust Duppression: Soils exposed during excavation for site preparation and project construction activities shall be kept moist throughout the time they are exposed, both during and after work hours.

- iii. Surface Water Runoff Control: Where soils are stockpiled, visqueen shall be used to create an impermeable liner, both beneath and on top of the soils, with a berm to contain any potential surface water runoff from the soil stockpiles during inclement weather.
- iv. Soils Replacement: If necessary, clean fill or other suitable material(s) shall be used to bring portions of the project site, where lead-contaminated soils have been excavated and removed, up to construction grade.
- v. Hauling and Disposal: Contaminated soils shall be hauled off the project site by waste hauling trucks appropriately certified with the State of California and adequately covered to prevent dispersion of the soils during transit, and shall be disposed of at a permitted hazardous waste disposal facility registered with the State of California.

d: Preparation of Closure/Certification Report

After excavation and foundation construction activities are completed, the project sponsor shall prepare and submit a closure/certification report to DPH for review and approval. The closure/certification report shall include the mitigation measures in the SMP for handling and removing lead-contaminated soils from the project site, whether the construction contractor modified any of these mitigation measures, and how and why the construction contractor modified those mitigation measures.

Mitigation Measure 3: Archaeological Resources

Based on a reasonable presumption that archeological resources may be present within the project site, the following measures shall be undertaken to avoid any potentially significant adverse effect from the proposed project on buried or submerged historical resources. The project sponsor shall retain the services of a qualified archeological consultant having expertise in California prehistoric and urban historical archeology. The archeological consultant shall undertake an archeological testing program as specified herein. In addition, the consultant shall be available to conduct an archeological monitoring and/or data recovery program if required pursuant to this measure. The archeological consultant's work shall be conducted in accordance with this measure at the direction of the Environmental Review Officer (ERO). All plans and reports prepared by the consultant as specified herein shall be submitted first and directly to the ERO for review and comment, and shall be considered draft reports subject to revision until final approval by the ERO. Archeological monitoring and/or data recovery programs required by this measure could suspend construction of the project for up to a maximum of four weeks. At the direction of the ERO, the suspension of construction can be extended beyond four weeks only if such a suspension is the only feasible means to reduce to a less than significant level potential effects on a significant archeological resource as defined in CEQA Guidelines Sect. 15064.5 (a)(c).

Archeological Testing Program. The archeological consultant shall prepare and submit to the ERO for review and approval an archeological testing plan (ATP). The archeological testing program shall be conducted in accordance with the approved ATP. The ATP shall identify the property types of the expected archeological resource(s) that potentially could be adversely affected by the proposed project, the testing method to be used, and the locations recommended for testing. The purpose of the archeological testing program will be to determine to the extent possible the presence or absence of archeological resources and to identify and to evaluate whether any archeological resource encountered on the site constitutes an historical resource under CEQA.

At the completion of the archeological testing program, the archeological consultant shall submit a written report of the findings to the ERO. If based on the archeological testing program the archeological consultant finds that significant archeological resources may be present, the ERO in

consultation with the archeological consultant shall determine if additional measures are warranted. Additional measures that may be undertaken include additional archeological testing, archeological monitoring, and/or an archeological data recovery program. If the ERO determines that a significant archeological resource is present and that the resource could be adversely affected by the proposed project, at the discretion of the project sponsor either:

- A) The proposed project shall be re-designed so as to avoid any adverse effect on the significant archeological resource; or
- B) A data recovery program shall be implemented, unless the ERO determines that the archeological resource is of greater interpretive than research significance and that interpretive use of the resource is feasible.

Archeological Monitoring Program. If the ERO in consultation with the archeological consultant determines that an archeological monitoring program shall be implemented the archeological monitoring program shall minimally include the following provisions:

- The archeological consultant, project sponsor, and ERO shall meet and consult on the scope of the AMP reasonably prior to any project-related soils disturbing activities commencing. The ERO in consultation with the archeological consultant shall determine what project activities shall be archeologically monitored. In most cases, any soils-disturbing activities, such as demolition, foundation removal, excavation, grading, utilities installation, foundation work, driving of piles (foundation, shoring, etc.), site remediation, etc., shall require archeological monitoring because of the risk these activities pose to potential archaeological resources and to their depositional context;
- The archeological consultant shall advise all project contractors to be on the alert for evidence of the presence of the expected resource(s), of how to identify the evidence of the expected resource(s), and of the appropriate protocol in the event of apparent discovery of an archeological resource;
- The archeological monitor(s) shall be present on the project site according to a schedule agreed upon by the archeological consultant and the ERO until the ERO has, in consultation with project archeological consultant, determined that project construction activities could have no effects on significant archeological deposits;
- The archeological monitor shall record and be authorized to collect soil samples and artifactual/ecofactual material as warranted for analysis;
- If an intact archeological deposit is encountered, all soils-disturbing activities in the vicinity of the deposit shall cease. The archeological monitor shall be empowered to temporarily redirect demolition/excavation/pile driving/construction activities and equipment until the deposit is evaluated. If in the case of pile driving activity (foundation, shoring, etc.), the archeological monitor has cause to believe that the pile driving activity may affect an archeological resource, the pile driving activity shall be terminated until an appropriate evaluation of the resource has been made in consultation with the ERO. The archeological consultant shall immediately notify the ERO of the encountered archeological deposit. The archeological consultant shall make a reasonable effort to assess the identity, integrity, and significance of the encountered archeological deposit, and present the findings of this assessment to the ERO.

Whether or not significant archeological resources are encountered, the archeological consultant shall submit a written report of the findings of the monitoring program to the ERO.

Archeological Data Recovery Program. The archeological data recovery program shall be conducted in accord with an archeological data recovery plan (ADRP). The archeological consultant, project sponsor, and ERO shall meet and consult on the scope of the ADRP prior to preparation of a draft ADRP. The archeological consultant shall submit a draft ADRP to the ERO. The ADRP shall identify how the proposed data recovery program will preserve the significant information the archeological resource is expected to contain. That is, the ADRP will identify what scientific/historical research questions are applicable to the expected resource, what data classes the resource is expected to possess, and how the expected data classes would address the applicable research questions. Data recovery, in general, should be limited to the portions of the historical property that could be adversely affected by the proposed project. Destructive data recovery methods shall not be applied to portions of the archeological resources if nondestructive methods are practical.

The scope of the ADRP shall include the following elements:

- *Historical Context* Historical background of project site and of historical themes related to history of site by which to predict and evaluate historical significance of expected archeological resources.
- *Research Themes and Questions.* Significant historical/scientific research issues and specific questions to which data from the expected archeological resources would provide a consequential contribution.
- *Field Methods and Procedures.* Descriptions of proposed field strategies, procedures, and operations.
- *Cataloguing and Laboratory Analysis.* Description of selected cataloguing system and artifact analysis procedures.
- *Discard and Deaccession Policy.* Description of and rationale for field and post-field discard and deaccession policies.
- *Interpretive Program.* Consideration of an on-site/off-site public interpretive program during the course of the archeological data recovery program.
- *Security Measures.* Recommended security measures to protect the archeological resource from vandalism, looting, and non-intentionally damaging activities.
 - *Final Report.* Description of proposed report format and distribution of results.
 - *Curation.* Description of the procedures and recommendations for the curation of any recovered data having potential research value, identification of appropriate curation facilities, and a summary of the accession policies of the curation facilities.

Human Remains and Associated or Unassociated Funerary Objects. The treatment of human remains and of associated or unassociated funerary objects discovered during any soils disturbing activity shall comply with applicable State and Federal laws. This shall include immediate notification of the Coroner of the City and County of San Francisco and in the event of the Coroner's determination that the human remains are Native American remains, notification of the California State Native American Heritage Commission (NAHC) who shall appoint a Most Likely Descendant (MLD) (Pub. Res. Code Sec. 5097.98). The archeological consultant, project sponsor, and MLD shall make all reasonable efforts to develop an agreement for the treatment of, with appropriate dignity, human remains and associated or unassociated funerary objects (CEQA Guidelines. Sec. 15064.5(d)). The agreement should take into consideration the appropriate excavation, removal, recordation, analysis, custodianship, curation, and final disposition of the human remains and associated or unassociated funerary objects.

Final Archeological Resources Report. The archeological consultant shall submit a Draft Final Archeological Resources Report (FARR) to the ERO that evaluates the historical significance of any discovered archeological resource and describes the archeological and historical research methods employed in the archeological testing/monitoring/data recovery program(s) undertaken. Information that

may put at risk any archeological resource shall be provided in a separate removable insert within the final report.

Once approved by the ERO, copies of the FARR shall be distributed as follows: California Archaeological Site Survey Northwest Information Center (NWIC) shall receive one (1) copy and the ERO shall receive a copy of the transmittal of the FARR to the NWIC. The Major Environmental Analysis division of the Planning Department shall receive three copies of the FARR along with copies of any formal site recordation forms (CA DPR 523 series) and/or documentation for nomination to the National Register of Historic Places/California Register of Historical Resources. In instances of high public interest in or the high interpretive value of the resource, the ERO may require a different final report content, format, and distribution than that presented above.

Transportation Improvement Measures Proposed as Part of the Project

Improvement Measure 1

During the construction period, the project sponsor would cause to limit construction truck movement to the hours between 9:00 a.m. and 3:30 p.m., or other hours if approved by the DPT, and to prohibit staging or unloading of equipment and materials during the periods of 7:00 a.m. to 9:00 a.m. and 3:30 p.m. to 6:00 p.m., to minimize peak-period traffic conflicts and to accommodate queuing of Muni buses during the peak hours of service. The project sponsor and construction contractor would meet with the Traffic Engineering Division of DPT, the Fire Department, Muni, and the Planning Department to determine feasible traffic management and mitigation measures to reduce traffic congestion during construction of this project and other nearby projects. To minimize cumulative traffic impacts due to lane closures during construction, the project sponsor would coordinate with construction contractors for any concurrent nearby projects that are planned for construction of which later become known.

Improvement Measure 2

The project sponsor would, in cooperation with Muni, install eyebolts or make provision for the direct attachment of eyebolts for Muni trolley wires on the project building whenever necessary, or agree to waive all rights to refuse the attachment of eye bolts to the project building if such attachment is done at the City's expense.

The following are improvement measures that have not been agreed to by the project sponsor but are recommended by the Planning Department.

Improvement Measure 3

If the project parking garage were to provide parking for the general public, the project sponsor shall provide an electronic "Full" sign that is clearly visible from the street outside the parking garage entrance to ensure that on-street vehicle queuing would be minimized.

Improvement Measure 4

The project would not have a considerable contribution to the significant cumulative p.m. peak-hour traffic impact at the intersections of 15th/Valencia Streets and 14th/Valencia Street. However, the following measures are recommended to address those cumulative effects:

The San Francisco Department of Parking and Traffic (DPT) could, if deemed appropriate at a future time, establish a separate right-turn lane on the southbound Valencia Street approach to 15th Street. The intersection level of service under cumulative (2015) conditions would improve to LOS B if this measure were implemented. This measure would require removal of on-street parking spaces on the west side of Valencia Street, and configuration of pavement markings and signs to channelize autos into the right-turn lane without substantially impeding access to the Class II bicycle lane. This measure is not required to mitigate a project impact, but rather is a measure that could be implemented by DPT to reduce impacts caused by estimated cumulative growth in traffic, to which the project would contribute.

DPT could, if deemed appropriate at a future time, modify the traffic signal phasing and timing at the 14th/Valencia Streets intersection during the p.m. peak period, specifically by providing a phase for southbound through and left-turn traffic only, in advance of the current phase for north-south traffic on signal phases of Valencia Street. The change in signal phasing and timing would improve the p.m. peak-hour traffic level of service to an acceptable (LOS D). This measure is not required to mitigate a project impact, but rather is a measure that could be implemented by DPT to reduce impacts caused by estimated cumulative growth in traffic, to which the project would contribute.

E. ALTERNATIVES

The EIR will analyze alternatives to the project that would reduce or eliminate significant environmental effects. The alternatives will include the following:

1. No-Project Alternative. The No-Project Alternative is required by CEQA. The existing building and parking lot would remain on the site.
2. Preservation Alternative. This alternative would involve construction of a residential project on the site under a reduced development program that would preserve parts of the existing Louis Roesch Co. building at 1886 Mission Street.

MANDATORY FINDINGS OF SIGNIFICANCE

Yes No Discussed

- | | | | | |
|----|---|----------|----------|----------|
| 1) | Does the project have the potential to degrade the quality of the environment, substantially reduce the habitat of a fish or wildlife species, cause a fish or wildlife population to drop below self-sustaining levels, threaten to eliminate a plant or animal community, reduce the number or restrict the range of a rare or endangered plant or animal, or eliminate important examples of the major periods of California history or pre-history? | <u>X</u> | _____ | _____ |
| 2) | Does the project have the potential to achieve short-term, to the disadvantage of long-term, environmental goals? | _____ | <u>X</u> | _____ |
| 3) | Does the project have possible environmental effects which are individually limited, but cumulatively considerable? (Analyze in the light of past projects, other current projects, and probable future projects.) | _____ | <u>X</u> | <u>X</u> |
| 4) | Would the project cause substantial adverse effects on human beings, either directly or indirectly? | _____ | <u>X</u> | _____ |

ON THE BASIS OF THIS INITIAL STUDY

_____ I find the proposed project COULD NOT have a significant effect on the environment, and a NEGATIVE DECLARATION will be prepared by the Department of City Planning.

_____ I find that although the proposed project could have a significant effect on the environment, there WILL NOT be a significant effect in this case because the mitigation measures have been included as part of the proposed project. A MITIGATED NEGATIVE DECLARATION will be prepared.

X I find that the proposed project MAY have a significant effect on the environment, and an ENVIRONMENTAL IMPACT REPORT is required.

April 23, 2005
Date

PAUL MALTZER
Environmental Review Officer
for
DEAN MACRIS
Director of Planning
Planning Department

**PLACE
POSTAGE
HERE**

The Planning Department
1660 Mission Street, Suite 500
San Francisco, CA 94103-2414

Attn: Paul Maltzer
1880 Mission Street Project (2000.1164E)

PLEASE CUT ALONG DOTTED LINE

RETURN REQUEST REQUIRED FOR FINAL
ENVIRONMENTAL IMPACT REPORT

REQUEST FOR FINAL ENVIRONMENTAL IMPACT REPORT

TO: San Francisco Planning Department

Please send me a copy of the Final EIR.

Signed: _____

Print Your Name and Address Below

